



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 24 2016

Mr. Jeff Cown
Director, Land Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
Two Martin Luther King, Jr. Drive
Suite 1154 East
Atlanta, Georgia 30334

SUBJ: Intent to Pursue Formal Enforcement Action Pursuant to RCRA Section 3008(a)(2)

SNF Flocryl, Inc.-Acrylamide
EPA ID # - GAR 000 022 764

SNF Flocryl, Inc.-Acrylate
EPA ID # - GAR 000 004 325

SNF Chemtall
EPA ID # - GAD 045 469 160

Dear Mr. Cown:

On July 19, 2016, the U.S. Environmental Protection Agency conducted RCRA compliance evaluation inspections at the SNF facilities listed above to determine their compliance status with RCRA and applicable state regulations.

Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), this letter shall serve as a notice to the State of Georgia that the EPA, Region 4, intends to pursue a formal enforcement action against the SNF facilities. The EPA is seeking the imposition of civil penalties pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), for alleged violations of the Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 *et seq.* [Subtitle C of RCRA, 42 U.S.C. §§ 6921 to 6939(f)], and the Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 [40 C.F.R. Parts 260 through 270, 273 & 279].

If you should have any questions concerning this matter, please contact Daryl R. Himes, of my staff, by phone at (404) 562-8614 or by email at himes.daryl@epa.gov.

Sincerely,

Larry L. Lamberth
Chief, Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

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ATLANTA, GEORGIA 30303-8960

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OCT 24 2016

Brent Hanson
Environmental Manager
SNF Floeryl, Inc.-Acrylamide
3 Chemical Plant Road
Riceboro, Georgia 31323

SUBJ: Notice of Opportunity to Show Cause

SNF Floeryl, Inc.-Acrylamide
EPA ID # - GAR 000 022 764

SNF Floeryl, Inc.-Acrylate
EPA ID # - GAR 000 004 325

SNF Chemtall
EPA ID # - GAD 045 469 160

Dear Mr. Hanson:

On July 19, 2016, the U.S. Environmental Protection Agency conducted a Resource Conservation Recovery Act (RCRA) compliance evaluation inspection (CEI) at SNF Floeryl, Inc.-Acrylamide, 3 Chemical Plant Road; SNF Floeryl, Inc.-Acrylate, 674 Chemical Plant Road; and SNF Chemtall, 1 Chemical Plant Road, all located in Riceboro, Georgia. The purpose of the inspections was to evaluate SNF's compliance with applicable RCRA regulations.

The EPA has determined that the facilities may not be in compliance with several requirements of the Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 *et seq.* (Subtitle C of RCRA, 42 U.S.C. §§ 6921 to 6939c), and the regulations promulgated pursuant thereto at Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (40 C.F.R. Parts 260 through 279) based on potential deficiencies observed during the CEI. The observations made during the inspection are summarized in the attached RCRA CEI Report.

Please provide a detailed written response **within fourteen (14) days** following receipt of this letter describing any actions that SNF has taken and/or intends to take related to the observations documented in the RCRA CEI Report. Your response should be mailed to:

Daryl Himes
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

SNF is being offered the opportunity to meet with the EPA at its regional office located at the Sam Nunn Atlanta Federal Center, 61 Forsyth Street SW, Atlanta, Georgia, 30303, or by teleconference, to show cause why the EPA should not take formal enforcement action against SNF pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a). SNF may elect to be represented by legal counsel at this meeting and should be prepared to present relevant information and documentation pertaining to the EPA's observed deficiencies.

The EPA may determine that a formal enforcement action is appropriate and may assess civil penalties pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a). Therefore, SNF has the opportunity to present factors and documentation that could mitigate any penalties that may be assessed against the facility, including information on SNF's ability to pay a penalty. Prior to the meeting, SNF may review the RCRA Civil Penalty Policy via the following website:

<http://www2.epa.gov/sites/production/files/documents/rcpp2003-fnl.pdf>

and the revised penalty matrices found at:

<http://www2.epa.gov/sites/production/files/documents/revisionpenaltypolicy04910.pdf>.

Please be advised that any information provided by SNF at the meeting may be used by the EPA in any civil or criminal proceedings related to this or other matters. Any false, fictitious, or fraudulent material omissions, statements, or representations may subject SNF to criminal penalties under Section 3008(d)(3) of RCRA, 42 U.S.C. § 6928(d)(3).

If SNF chooses to accept this offer to meet with the EPA, the facility should contact Daryl Himes, **within fourteen (14) days** following receipt of this letter to schedule a meeting or conference call.

Mr. Himes can be reached at (404) 562-8616, or by email at himes.daryl@epa.gov. If you decide not to accept this offer to meet to discuss the observed deficiencies, the EPA may proceed with enforcement action against SNF as authorized under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), including the assessment of appropriate civil penalties and injunctive relief.

If your facilities are a Small Business or a Small Community, you can find compliance and enforcement resources specifically designed to meet your needs on link: <http://www2.epa.gov/enforcement/small-businesses-and-enforcement>. In that link you can also find information about the Small Business Regulatory Enforcement Fairness Act (SBREFA) that accords some right to small business and is aimed at providing assistance to small businesses and other small entities, making tools available for better understanding of the regulatory and enforcement processes, and seeing that there is no unfair treatment relating to the regulatory enforcement process.

Please feel free to contact Mr. Himes if you have any technical questions regarding the observations and findings from the inspection performed at the facility.

Sincerely,



Larry L. Lamberth
Chief, Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Michelle Zackery, GA EPD
Jane Hendricks, GA EPD

RCRA Inspection Report

1) Inspector and Author of Report

Daryl Himes
Environmental Engineer
U.S. Environmental Protection Agency (US EPA)
himes.daryl@epa.gov
(404) 562-8614

Enforcement and Compliance Branch
Resource Conservation and Restoration Division
US EPA Region IV SNAFC – 10th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

SNF Flocryl, Inc.-Acrylamide
3 Chemical Plant Road
Riceboro, Georgia 31323
EPA ID # - GAR 000 022 764

SNF Flocryl, Inc.-Acrylate
674 Chemical Plant Road
Riceboro, Georgia 31323
EPA ID # - GAR 000 004 325

SNF Chemtall
1 Chemical Plant Road
Riceboro, Georgia 31323
EPA ID # - GAD 045 469 160

3) Responsible Official

Brent Hanson
Environmental Manager

4) Inspection Participants

Daryl Himes, US EPA
Brent Hanson, SNF
Megan Smith, SNF
Mark Shepherd, SNF Flocryl, Inc. Acrylamide

5) Date of Inspection

July 19, 2016

6) Applicable Regulations

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k
Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927
40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279
The Georgia Hazardous Waste Management Act, §§ 12-8-60 to 83 of the Official Code of Georgia Annotated

Ga. Comp. R. and Regs. 391-3-11 of the Georgia Hazardous Waste Management Rules (GHWMR) (The Rules found in Chapter 391-3-11 were incorporated by reference 40 C.F.R. Parts 260-270, 273, and 279. Therefore, the citations in this report will be to the Rules found in 40 C.F.R. Parts 260-270, 273, and 279.)

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the facilities' compliance with all applicable RCRA regulations.

8) Facility Descriptions

Three SNF facilities, listed in the Facility Information Section above, are included as part of this inspection. The three facilities are located adjacent to each other on contiguous properties.

The Floeryl facilities manufacture acrylamides and acrylates, which are then transferred to the Chemtall facility for polymerization into various products.

The most recent Notification of Hazardous Waste Activity filed by the facilities indicated that the SNF Floeryl, Inc.-Acrylate facility is a large quantity generator of hazardous waste and the Chemtall and Floeryl-Acrylamide facilities are small quantity generators of hazardous wastes. Hazardous wastes generated by the facilities included D001 and D002 characteristic hazardous wastes and F002 and F003 listed hazardous wastes.

9) Findings

Upon arriving at the facilities, credentials were presented to Brent Hanson, Environmental Manager. Brent Hanson and Megan Smith gave a brief discussion of the relationship between the three SNF facilities. The discussion identified the relationship between the three facilities and the types of products produced by each. During the discussion, it was explained that products made by the Floeryl facilities are transferred to the Chemtall facility as raw material products. Products made by the SNF Floeryl, Inc.-Acrylamide facility are also made available as products to off-site facilities.

Acrylamide production requires the reaction of acrylonitrile in the presence of a biocatalyst to produce acrylamide and water. No hazardous wastes are generated as a result of this production process performed by the SNF Floeryl-Acrylamide facility. According to facility personnel, no cleanouts of facility equipment used for this production process are performed which would result in the generation of any hazardous waste.

Acrylate production requires the reaction of methyl acrylate and methyl methacrylate to make various acrylate products. A waste stream containing dimethyl amino ethanol is generated. This waste stream has a flash point of less than 140 degrees Fahrenheit and, thus, is collected and managed as a hazardous waste by the facility. This waste stream is generated in two locations within the Floeryl-Acrylate facility, North Plant and South Plant. The waste generated by the North Plant is collected in Tank V-550 (10,820 gallons). The waste generated by the South Plant is collected in Tank T-50 (11,000 gallons).

The Floeryl-Acrylate facility has a methanol wash tank called Tank T-306 (2,879 gallons), the contents of which are used to clean the inside of tanks and ancillary equipment. Periodically, the wash material is removed from the tank by pumping it to a tank truck for off-site disposal as a hazardous waste.

The Chemtal facility generates waste filter bags, which are used to screen out impurities from acrylamide being transferred from the Floeryl-Acrylamide facility. The bags are characterized as U007 (acrylamide) or U122 (formaldehyde) listed hazardous wastes. The U122 hazardous waste is generated in the filter bags as a result of formaldehyde being brought to the facility from off-site for use as ingredient in a production process.

Below are the findings of the walk-through inspection.

Floeryl-Acrylamide facility Laboratory

Two five-gallon containers of acrylamide waste were observed in this area. Each of the containers were labeled with the words "Hazardous Waste" and were closed at the time of the inspection. Upon being filled, hazardous waste from these containers is transferred to 55-gallon containers within this facility's less than 180-day hazardous waste accumulation area.

Floeryl-Acrylamide Less than 180-Day Hazardous Waste Accumulation Area

This area consists of a raised platform with secondary containment (Photo 1) for the accumulation of containerized hazardous wastes. The containment area had approximate dimensions of 6 feet by 24 feet. No hazardous waste was present in this area at the time of the inspection.

Floeryl-Acrylate Tank T-50

Tank T-50 was observed to be closed and labeled with the words "Hazardous Waste" (Photo 4) at the time of the time of the inspection.

Tags for air monitoring were present on equipment on ancillary equipment associated with the tank.

The secondary containment for the tank was in good condition and coated at the time of the inspection.

A pump within the secondary containment system appeared to have been leaking recently as a five-gallon pail containing hazardous waste was present at the time of the inspection, which was unlabeled and open (Photos 2 & 3).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(c)(1)(i)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.173(a)], a generator is required to keep containers of hazardous waste closed when waste is not being added or removed.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(c)(1)(ii)], a generator is required to mark satellite accumulation containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Flocryl-Acrylate Tank V-550

Tank V-550 (Photo 6) was observed to be closed and labeled with the words "Hazardous Waste" at the time of the inspection.

Tags for air monitoring were present on equipment (Photos 7 & 8) on ancillary equipment associated with the tank.

The walls of the secondary containment system for the tank were in good condition and were adequately coated at the time of the inspection. The base of the secondary containment system was covered with plastic grating at the time of the inspection (Photos 5 & 9). Water was present on the base of the secondary containment within the plastic grating, which did not enable the base of the secondary containment system to be inspected.

According to information received via email from Brent Hanson on July 19, 2016, the plastic grating was installed on February 23, 2015. Additionally, on February 24, 2016, the grating was picked up so the secondary containment system could be recoated. On April 6, 2016, the secondary containment system was recoated and the grating was reinstalled on April 16, 2016.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(a)(1)(ii)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.195(b)], a generator accumulating hazardous waste in tanks must conduct daily inspections of a tanks secondary containment system.

Flocryl-Acrylate Tank T-306

Tank T-306 (Photo 10) was observed to be closed and labeled with an appropriate National Fire Protection Association fire diamond at the time of the inspection.

The tank was located within a secondary containment system capable of handling the volume of the tank if the tanks were to rupture.

At the time of the inspection, the contents of the tank were being managed as a product, as discussed above; the contents of the tank are periodically transferred to a tank truck and sent off-site as an F003 listed hazardous waste.

During a discussion with facility personnel, it was explained to facility personnel, that once a decision is made to transfer the material to a tank truck and manage it as a hazardous waste, Tank T-306 would need to comply with the applicable hazardous waste tank standards during the periods of time in which the transfer of material from the tank to the tank truck is occurring. These requirements would include labeling the tank with the words "Hazardous Waste," and having adequate secondary containment. The tank would be exempt from air monitoring requirements because it would be operated as a hazardous waste tank for less than 300 hours per calendar year.

Chemtall Less than 180-Day Hazardous Waste Accumulation Area

Two 35-gallon drums of hazardous waste filter bags were observed in this area (Photo 11). The area is located on a concrete pad which has a secondary containment berm around its perimeter. Each of the containers were labeled with the words "Hazardous Waste" and were closed at the time of the inspection.

One 55-gallon drum of spent aerosol cans was also observed in this area (Photo 11). The container was labeled with the words "Hazardous Waste" and was closed at the time of the inspection.

Chemtall Universal Waste Accumulation Area

Two truck totes of universal waste batteries were observed in this area. Each was labeled with applicable universal waste descriptions, closed and dated at the time of the inspection.

One tote of used oil was observed in this area. It was labeled with the words "Used Oil" at the time of the inspection.

Chemtall Maintenance Storage Building

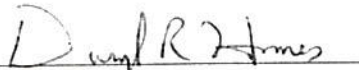
One 8-foot and one 4-foot cardboard tubes (Photos 12 & 13) of universal waste batteries was observed in this area, which contained universal waste fluorescent tubes. The containers were not labeled or dated at the time of the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e) and 273.15(c)(1)], a generator must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps" and must label or mark each lamp or container of lamps with the earliest date that any Universal Waste in the container became a waste or was received, respectively.

10) Record Review

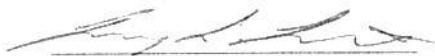
The facility's manifests, contingency plan, and inspection records were reviewed at the time of the inspection. The facility's training records were subsequently emailed to the EPA.

11) Signed


Daryl R. Himes
Environmental Engineer

10/19/2016
Date

12) Concurrence


Larry L. Lamberth
Chief, Enforcement and Compliance Branch
Resource Conservations and Restoration Division

10/24/16
Date

Photographs

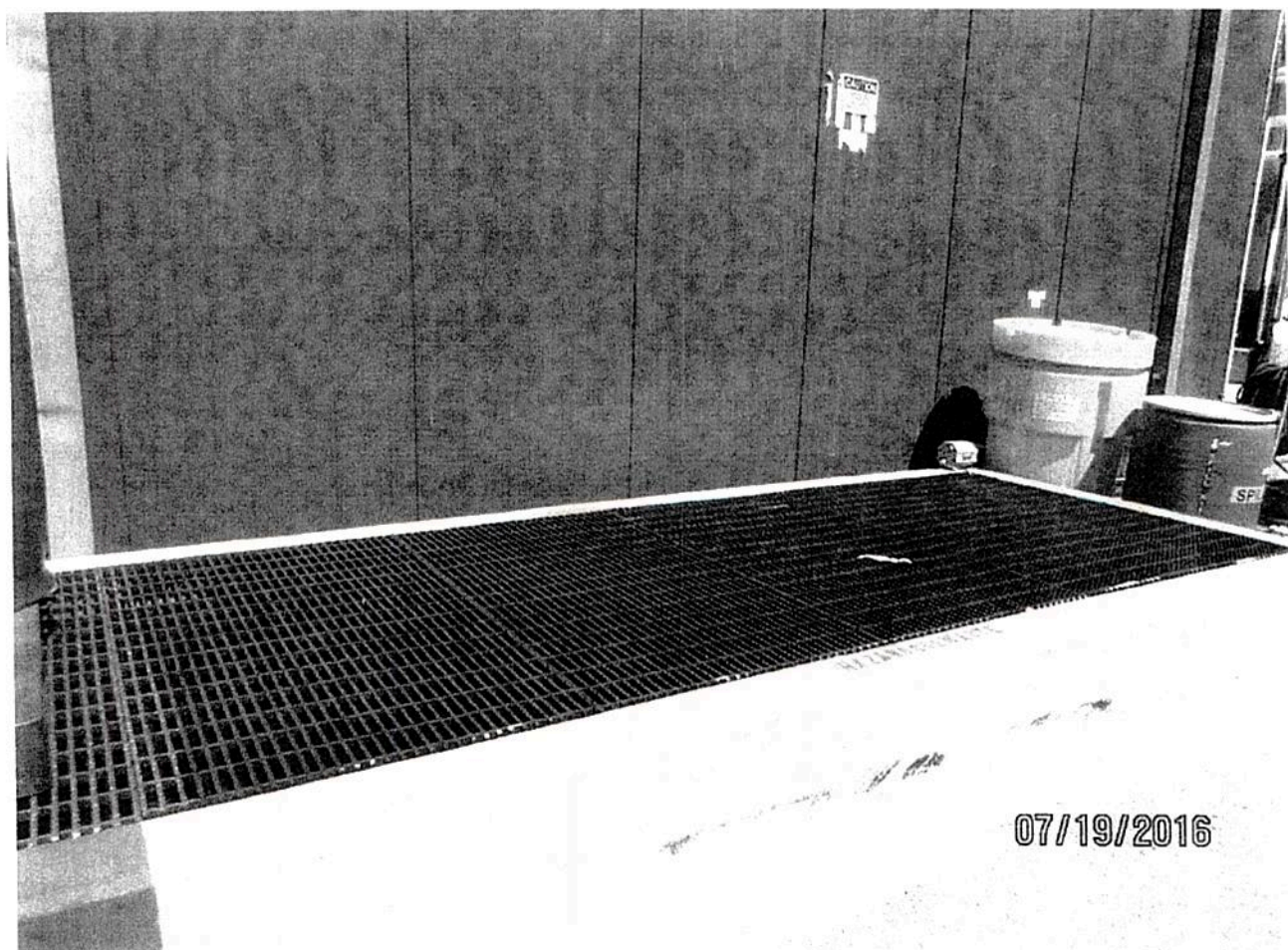


Photo 1 – Floeryl-Acrylamide facility - Less than 180-Day Hazardous Waste Accumulation Area - container accumulation area



Photo 2 – Floeryl-Acrylate facility - Tank T-50 - Five-gallon container of hazardous waste from leaking pump within the secondary containment

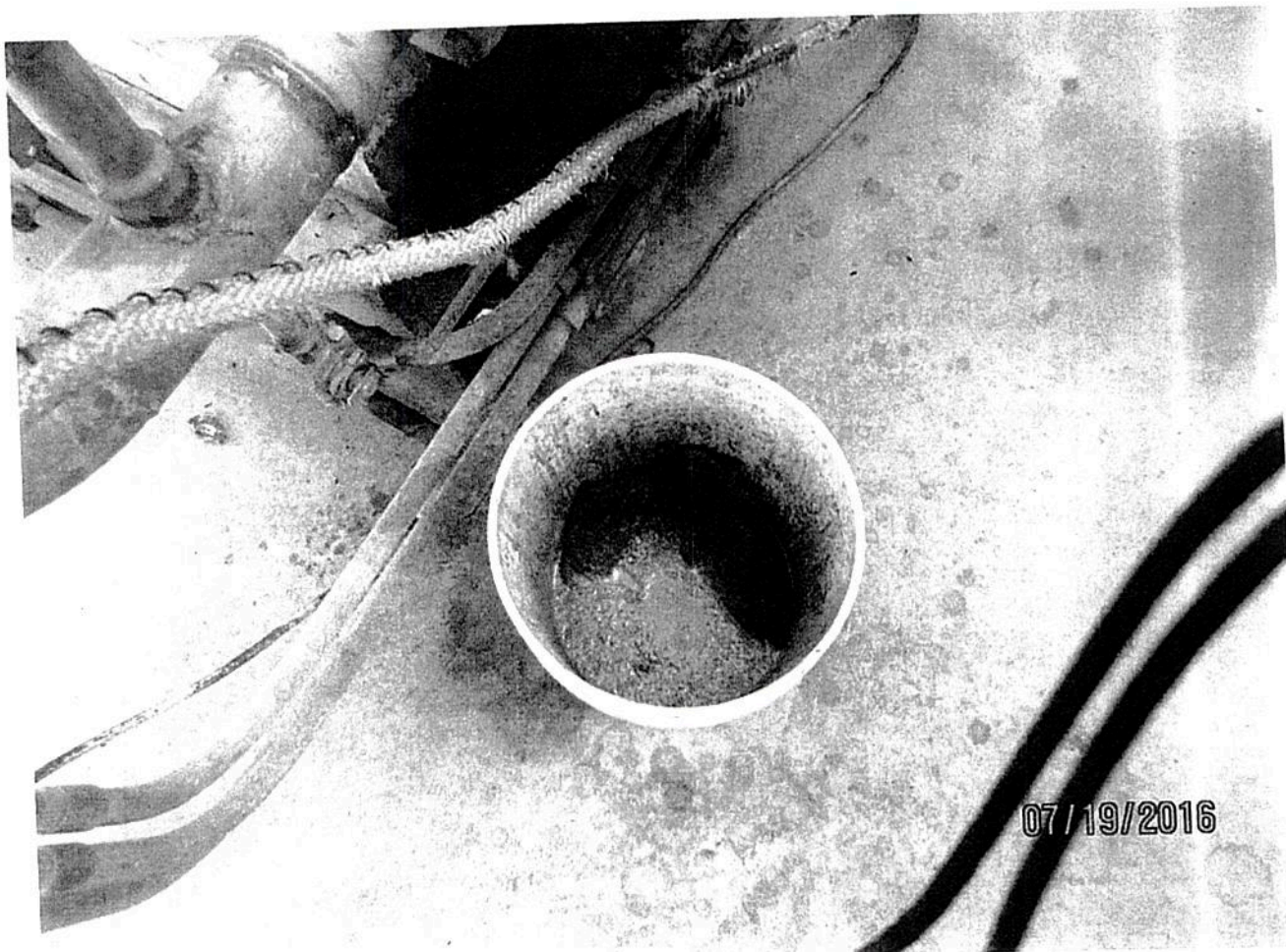


Photo 3 – Floeryl-Acrylate facility - Tank T-50 - Five-gallon container of hazardous waste from leaking pump within the secondary containment

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:
NAME: SNF FLOCRYL ACRYLATES
ADDRESS: 674 CHEM PLT. ROAD PHONE 884-3366
CITY: RICEBORO STATE GA ZIP 31323
EPA /MANIFEST
ID NO./ DOCUMENT NO. GAR000004325
ACQUITTANCE
START DATE: EPA
WASTE NO. D001

RESIDUE
T-50
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!

07/19/2016

Photo 4 – Flocryl-Acrylate facility – Hazardous Waste Tank T-50 - Hazardous Waste label

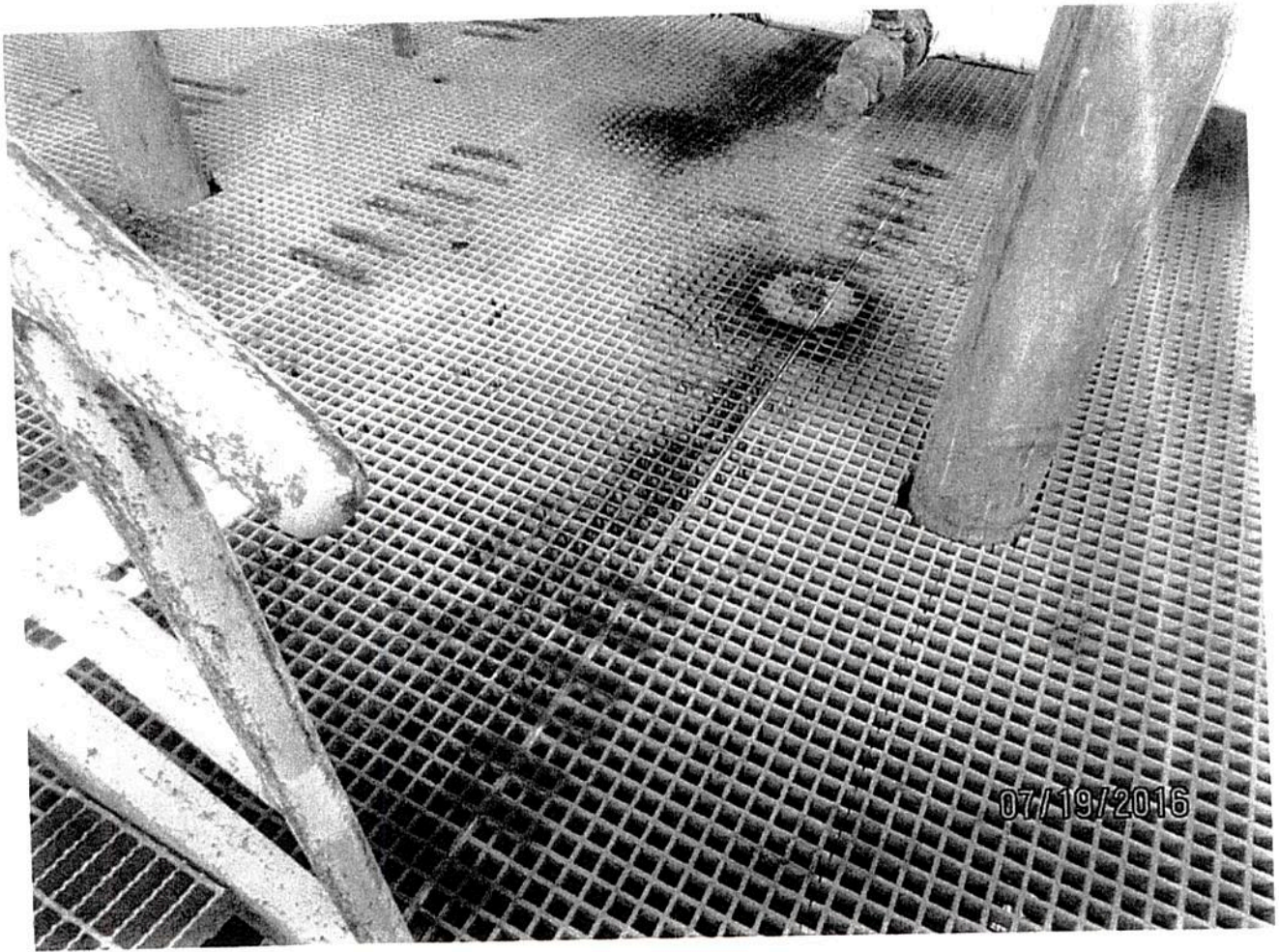


Photo 5 – Floccryl-Acrylate facility – Hazardous Waste Tank V-550 - Grating and water below



Photo 6 - Floeryl-Acrylate facility - Hazardous Waste Tank V-550

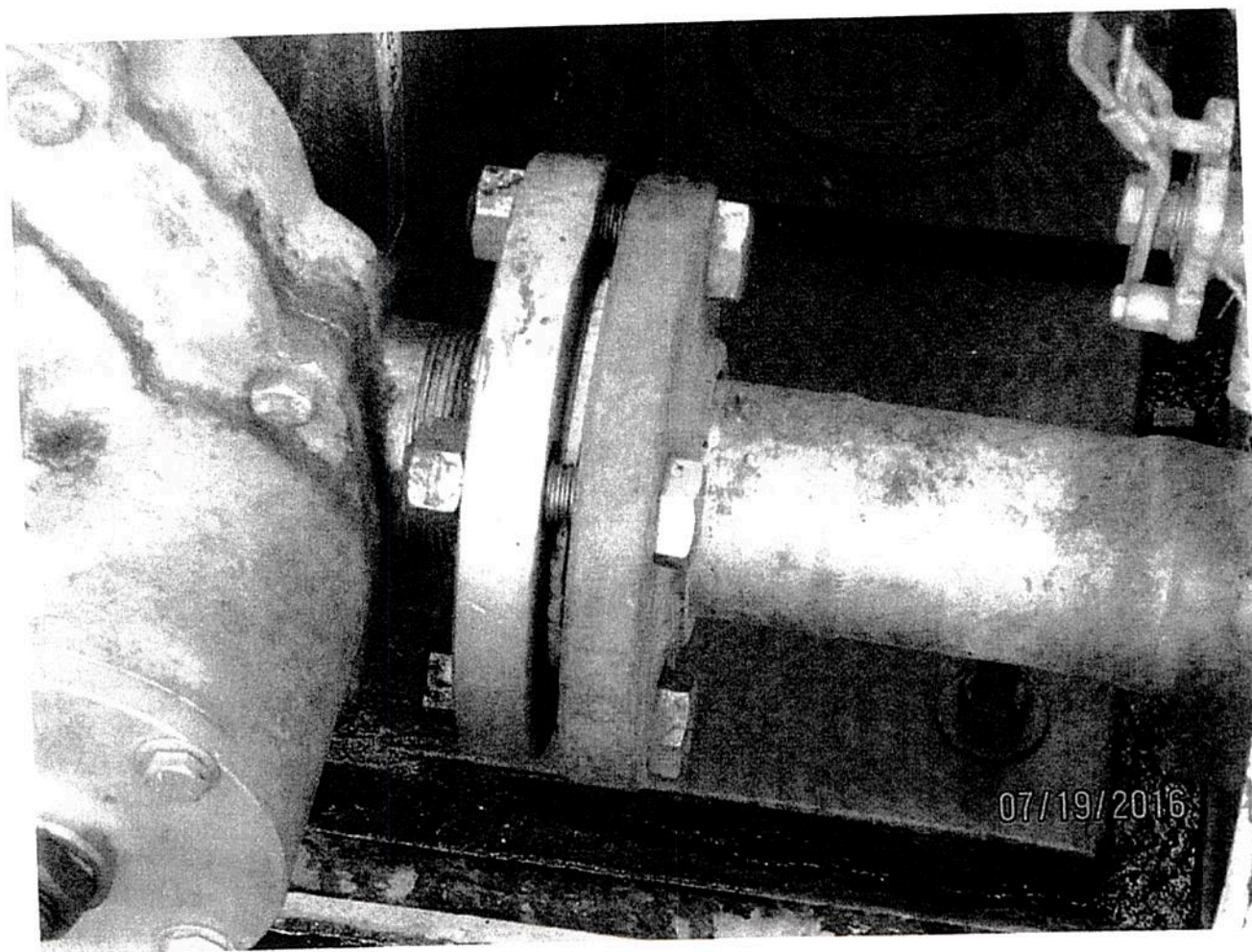


Photo 7 – Floeryl-Acrylate facility - Hazardous Waste Tank V-550 - Flange on hazardous waste piping associated with tank

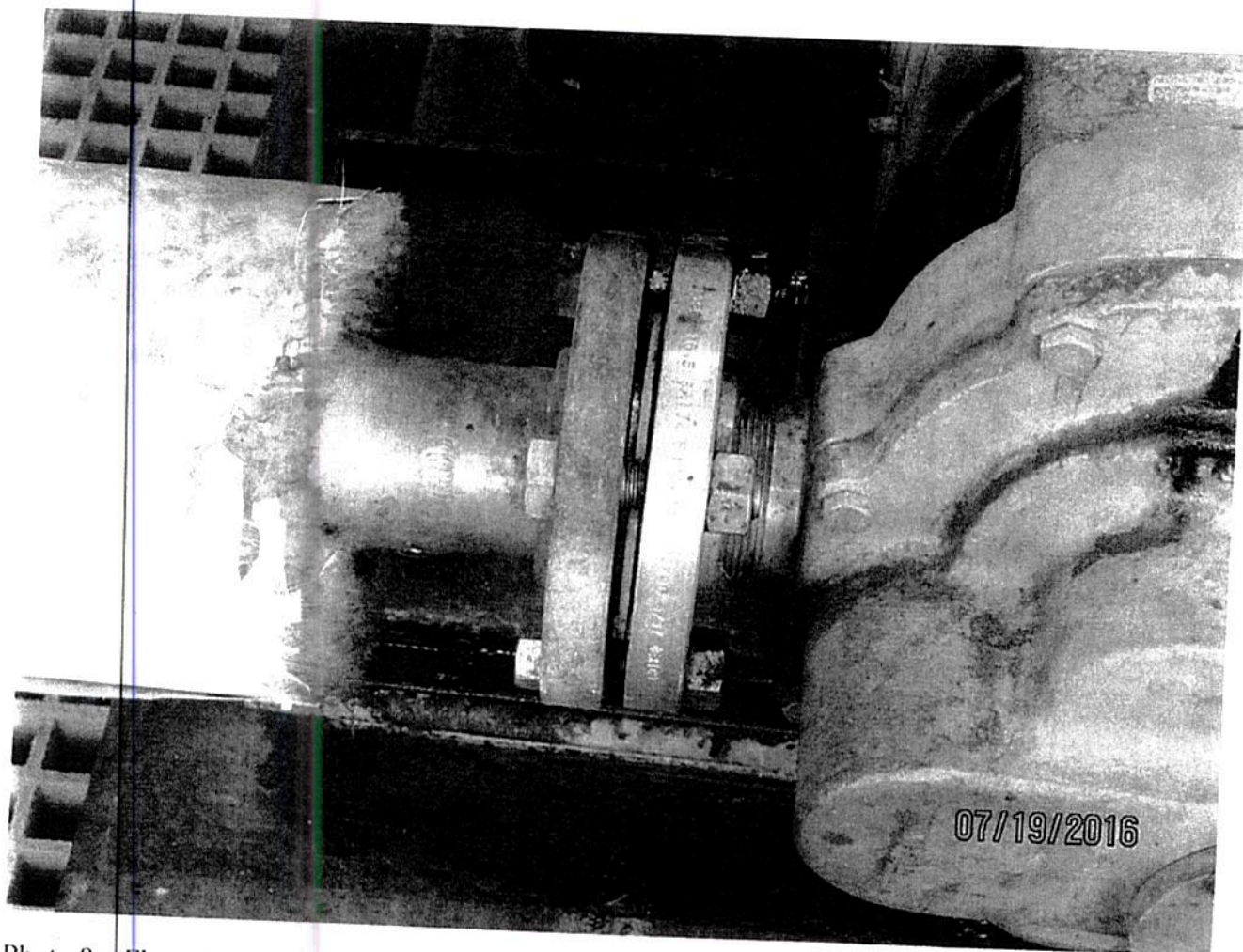


Photo 8 – Flocryl-Acrylate facility - Hazardous Waste Tank V-550 - Flange on hazardous waste piping associated with tank

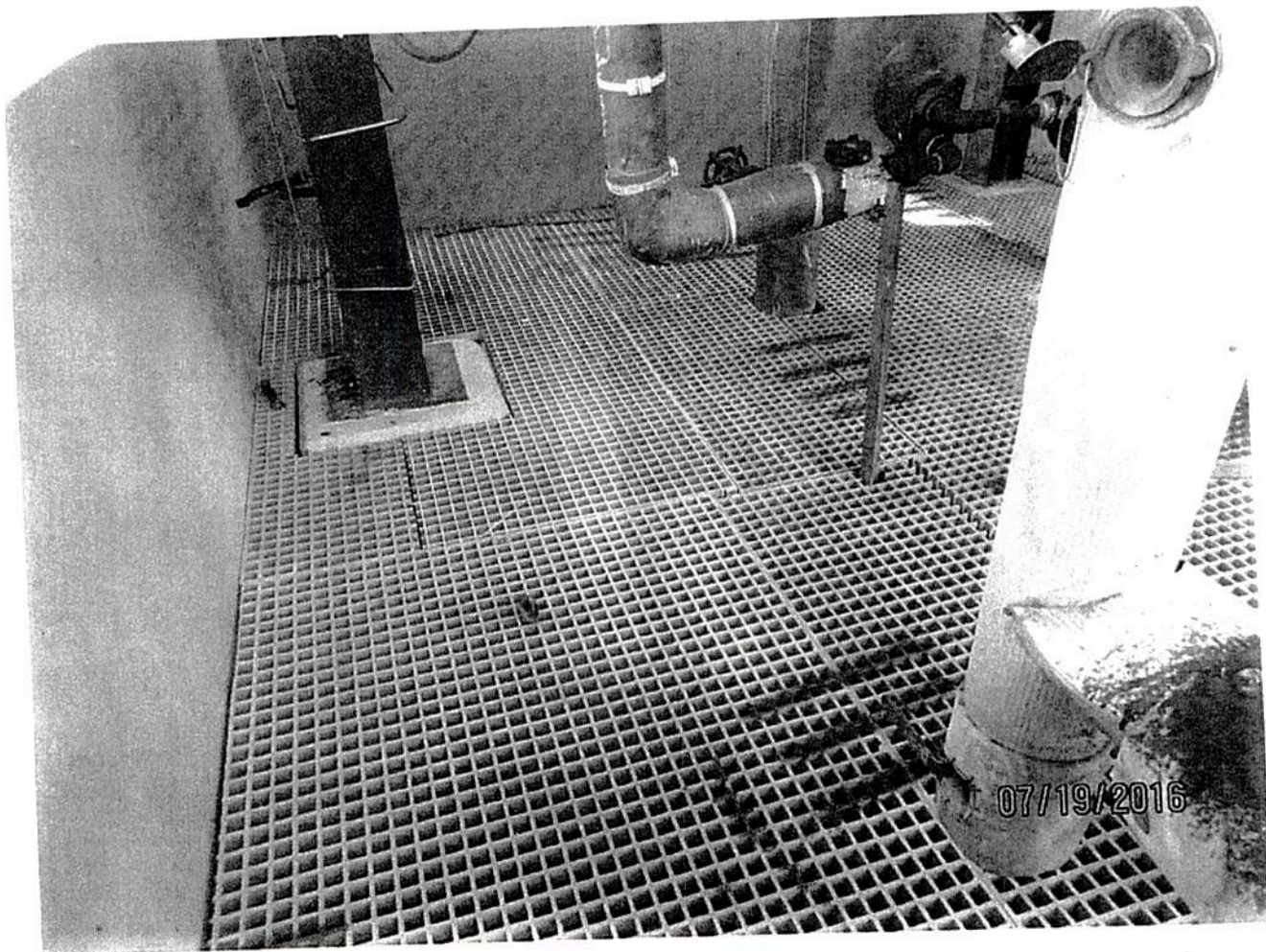


Photo 9 – Floccryl-Acrylate facility - Hazardous Waste Tank V-550 - Grating and water below and within grating on the base of tank

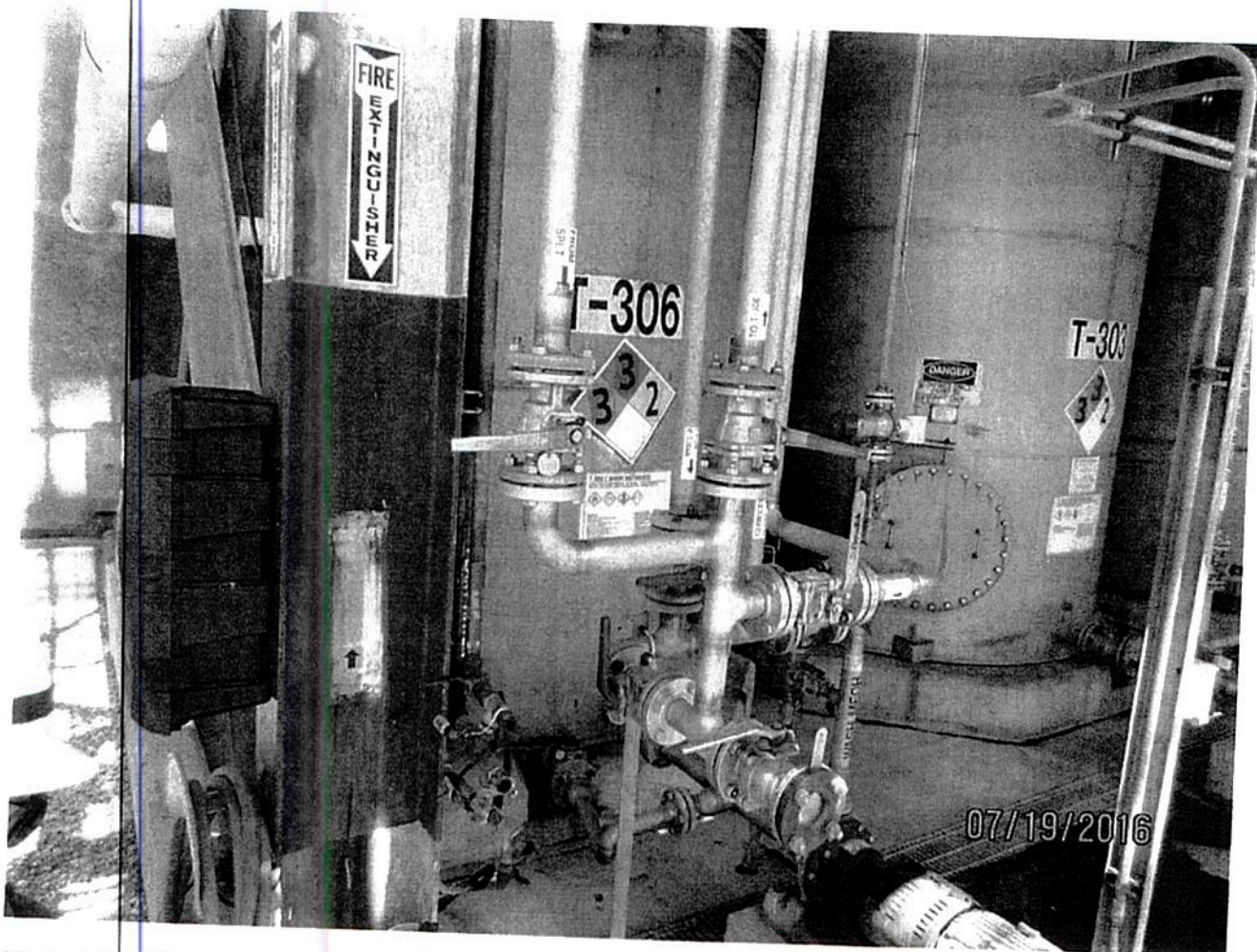


Photo 10 – Chemtall facility - Tank T-306 - used for the management of a methanol tank wash

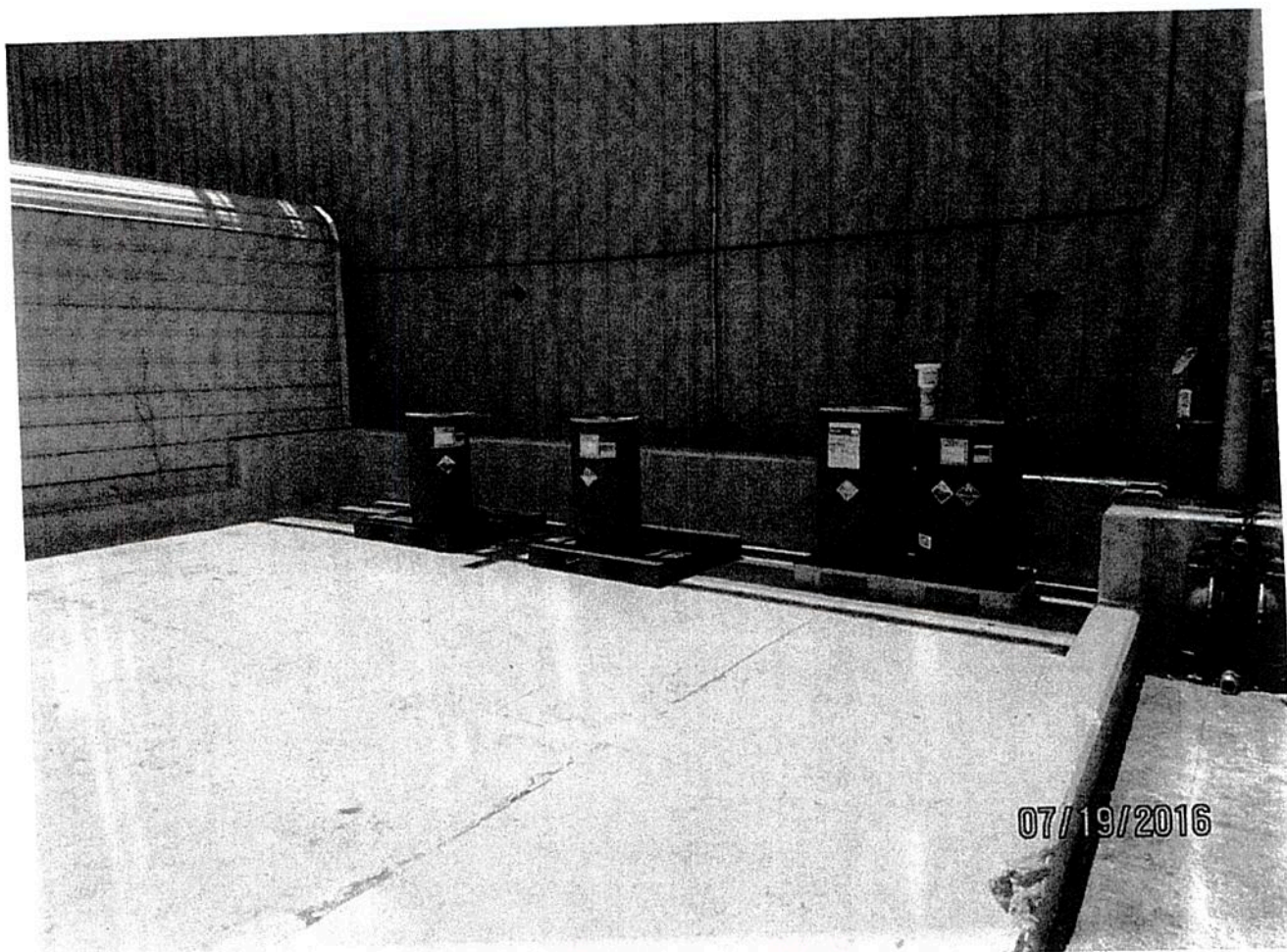


Photo 11 – SNF Chemtall facility - Less than 180-Day Hazardous Waste Accumulation area - container accumulation area

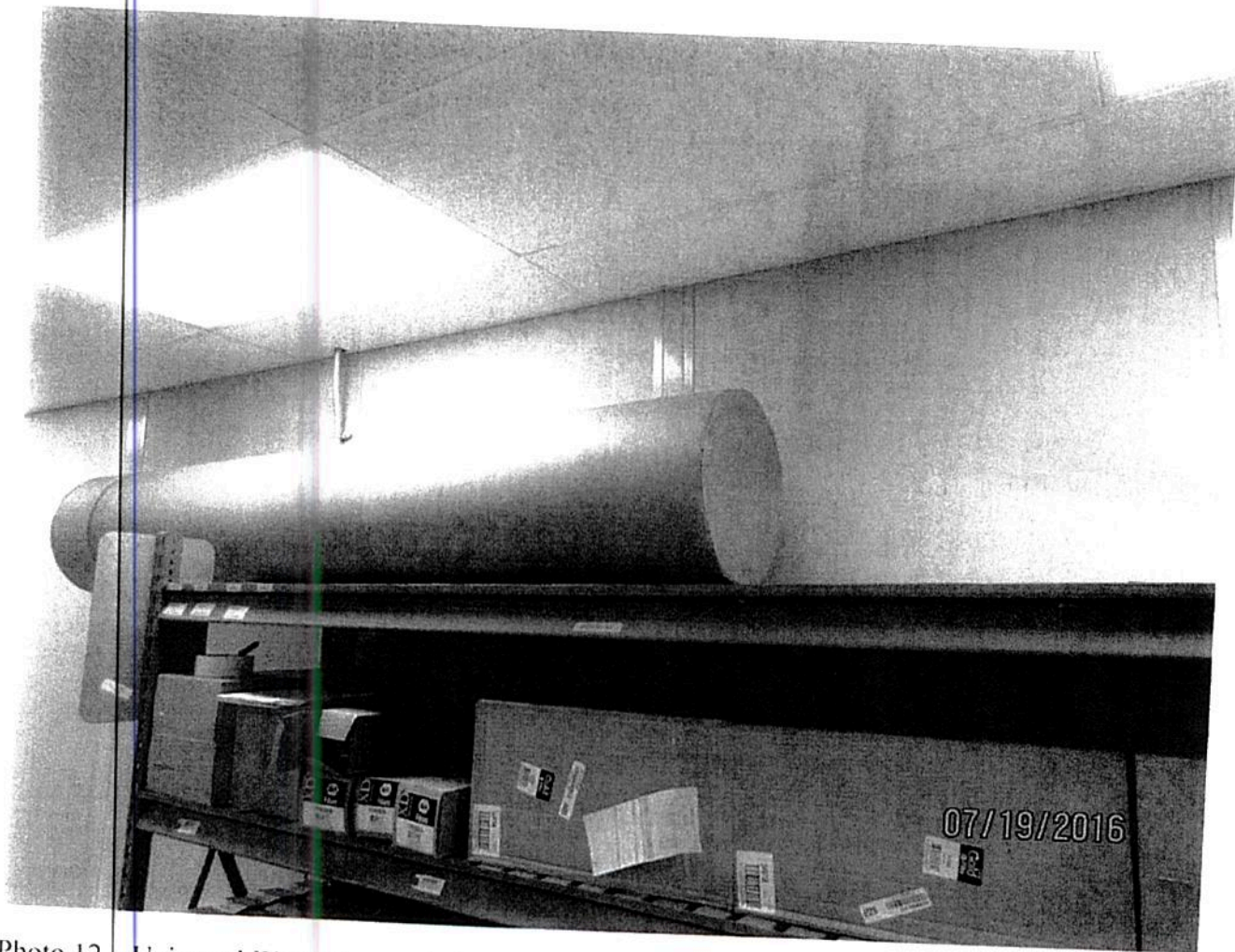


Photo 12 – Universal Waste Accumulation Area



Photo 13 – Universal Waste Accumulation Area



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 16 2017

CERTIFIED MAIL RETURN RECEIPT

Peter Nichols
President
SNF Holding Company
1 Chemical Plant Road
Riceboro, Georgia 31323

Re: SNF Holding Company, EPA ID# GAR 000 004 325
Consent Agreement and Final Order, Docket No. RCRA-04-2017-4002(b)

Dear Mr. Nichols,

Enclosed please find a copy of the executed Consent Agreement and Final Order (CA/FOs) as filed with the Regional Hearing Clerk in the above-referenced matter. Please note that payment of the civil penalty is due within thirty (30) days of the effective date of the CA/FO, which is the date the CA/FOs are filed with the Regional Hearing Clerk.

Thank you for your assistance in resolving this matter. If you have any questions, please feel free to contact me at (404) 562-8590 or by email at lamberth.larry@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry L. Lamberth".

Larry L. Lamberth
Chief, Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

IN THE MATTER OF:

SNF Holding Company
674 Chemical Plant Road
Riceboro, Georgia 31323
EPA ID No.: GAR 000 004 325

Respondent

DOCKET NO.: RCRA-04-2017-4002(b)

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. § 6928(a)

HEARING CLERK

2017 FEB 16 AM 7:07

2017 FEB 16 AM 7:07

CONSENT AGREEMENT

I. NATURE OF THE ACTION

1. This is a civil administrative enforcement action, pursuant to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), ordering compliance with the requirements of the Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 *et seq.* [Subtitle C of RCRA, 42 U.S.C. §§ 6921-6939f], and the regulations promulgated pursuant thereto and set forth at Georgia Hazardous Waste Management Rules (GHWMR), Ga. Comp. R. and Regs. 391-3-11-.01 to 391-3-11-.18 [Title 40 of the Code of Federal Regulations (C.F.R.), Parts 260 through 270]. This action seeks the imposition of civil penalties pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), for alleged violations of Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925] and the GHWMR, Ga. Comp. R. and Regs. 391-3-11-.01 to 391-3-11-.18 [40 C.F.R. Parts 260 through 270].
2. The *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, which govern this action and are promulgated at 40 C.F.R. Part 22, provide that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order (CA/FO). 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3).
3. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to settle this action. Accordingly, before any testimony has been taken upon the pleadings and without any admission of violation or adjudication of any issue of fact or law and in accordance with 40 C.F.R. § 22.13(b), Complainant and Respondent have agreed to the execution of this CA/FO, and Respondent hereby agrees to comply with the terms of this CA/FO.

II. THE PARTIES

4. Complainant is the Chief, Enforcement and Compliance Branch, Resource Conservation and Restoration Division, United States Environmental Protection Agency (EPA) Region 4. Complainant is authorized to issue the instant CA/FO pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), and applicable delegations of authority.
5. Respondent is SNF Holding Company, a for profit corporation, incorporated under the laws of Delaware, and registered to do business in the State of Georgia (State). Respondent is the owner and operator of a chemical manufacturing business comprised of three facilities – the SNF Flocryl, Inc. Acrylomite Plant; the SNF Flocryl, Inc. Acrylates Plant; and the SNF Chemtall Plant - located at 3 Chemical Plant Road, 674 Chemical Plant Road, and 1 Chemical Plant Road, respectively, Riceboro, Georgia (the “Acrylomite facility,” “Acrylates facility,” and “Chemtall facility,” respectively, and collectively, the “facilities.”).

III. PRELIMINARY STATEMENTS

6. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the State has received final authorization to carry out a hazardous waste program in lieu of the federal program set forth in RCRA. The requirements of the authorized State program are found at Sections 12-8-60 to 12-883 of the GHWMA, Ga. Code Ann. § 12-8-60 *et seq.*, and at Ga. Comp. R. and Regs. 391-311.01 to 391-3-11.18.
7. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), the requirements established by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616, are immediately effective in all states regardless of their authorization status and are implemented by the EPA until a state is granted final authorization with respect to those requirements. Georgia has received final authorization for certain portions of HSWA, including those recited herein.
8. Although the EPA has granted the State authority to enforce its own hazardous waste program, the EPA retains jurisdiction and authority to initiate an independent enforcement action pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2). This authority is exercised by the EPA in the manner set forth in the Memorandum of Agreement between the EPA and the State.
9. As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations for the violations alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.
10. Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), Complainant has given notice of this action to the State before issuance of this CA/FO.
11. Section 12-8-64(1)(A) of the GHWMA, Ga. Code Ann. § 12-8-64(1)(A) [Section 3002(a) of RCRA, 42 U.S.C. § 6922(a)], requires the promulgation of standards applicable to generators of hazardous waste. The implementing regulations for these standards are found at Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. Part 262].
12. Section 12-8-66 of the GHWMA, Ga. Code Aim. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], sets forth the requirement that a facility treating, storing, or disposing of hazardous waste must have a permit or interim status. The implementing regulations for this

requirement are found at Ga. Comp. R. and Regs. 391-3-11-.10(2) (permitted) and Ga. Comp. R. and Regs. 391-3-11-.10(1) (interim status)] [40 C.F.R. Parts 264 (permitted) and 265 (interim status)].

13. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], a "solid waste" is any discarded material that is not otherwise excluded from the regulations. A discarded material includes any material that is abandoned by being stored in lieu of being disposed.
14. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.3], a solid waste is a "hazardous waste" if it meets any of the criteria set forth in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.3(a)(2)] and is not otherwise excluded from regulation as a hazardous waste by Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(b)].
15. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. §§ 261.3(a)(2)(i) and 261.20], solid wastes that exhibit any of the characteristics identified in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. §§ 261.21-24] are characteristic hazardous wastes and are provided with the EPA Hazardous Waste Numbers D001 through D043.
16. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. §§ 261.20 and 261.21], a solid waste that exhibits the characteristic of ignitability is a hazardous waste and is identified with the EPA Hazardous Waste Number D001.
17. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a "generator" is defined as any person, by site, whose act or process produces hazardous waste identified or listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. Part 261], or whose act first causes a hazardous waste to become subject to regulation.
18. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a "facility" includes "all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste."
19. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a "person" includes a corporation.
20. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], an "owner" is "the person who owns a facility or part of a facility" and an "operator" is "the person responsible for the overall operation of a facility."
21. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], "storage" means the holding of a hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.
22. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a "tank system" is defined as a hazardous waste storage or treatment tank and its associated ancillary equipment and containment system.
23. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(a)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a

permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(a)(1)-(4)] (hereinafter referred to as the "LQG Permit Exemption").

24. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(a)(1)(ii)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.193], and is a condition of the LQG Permit Exemption, a generator is required to provide secondary containment which meets the applicable requirements of this part for each of its hazardous waste tanks.
25. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(a)(1)(ii)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.193], and is a condition of the LQG Permit Exemption, a generator is required to inspect the applicable parts of its hazardous waste tank system at least once each operating day.

IV. EPA ALLEGATIONS AND DETERMINATIONS

26. Respondent is a "person" as defined in Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10].
27. Respondent is the "owner/operator" of the SNF Flocryl, Inc. Acrylamide Plant, the SNF Flocryl, Inc. Acrylates Plant, and the SNF Chemtall Plant, each of which is a "facility" located at 3 Chemical Plant Road, 674 Chemical Plant Road, and 1 Chemical Plant Road, respectively, Riceboro, Georgia, as those terms are defined in Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10].
28. Respondent is a "generator" of "hazardous waste" as those terms are defined in Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10] and Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.3].
29. Respondent manufactures various acrylate products at the Acrylates facility. As a result of its manufacturing operations, the Acrylates facility generates a D001 characteristic hazardous waste.
30. On May 13, 2016, Respondent submitted a notification of hazardous waste activity for the Acrylates facility pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a) as an LQG of hazardous waste. Respondent notified as being a generator of a D001 characteristic hazardous waste.
31. On July 19, 2016, the EPA conducted a compliance evaluation inspection (CEI) at Respondent's facilities. The findings of the CEI were documented in a report mailed to Respondent, dated October 24, 2016 (hereinafter referred to as the "CEI Report").
32. During the July 19, 2016, CEI, the EPA observed Respondent to be accumulating D001 characteristic hazardous waste within Tank V-550 at the Acrylates facility for less than 90 days.

33. During the July 19, 2016, CEI, the EPA observed that Respondent had placed grating on the base of the secondary containment system for Tank V-550. The grating prevented the facility from being able to inspect the entire secondary containment system for the tank.
34. The EPA therefore alleges Respondent violated Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925] by storing hazardous waste without a permit or interim status, because Respondent failed to meet a condition of the LQG Permit Exemption set forth in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.34(a)(1)(ii)], by not inspecting Tank V-550 as required by Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.195].

V. TERMS OF AGREEMENT

Based on the foregoing Preliminary Statements, Allegations and Determinations, the parties agree to the following:

35. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out in the above paragraphs pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.
36. Respondent neither admits nor denies the factual allegations and determinations set out in this CA/FO.
37. Respondent waives any right to contest the allegations and its right to appeal the proposed Final Order accompanying the Consent Agreement.
38. Respondent waives its right to challenge the validity of this CA/FO and the settlement of the matters addressed in this CA/FO based on any issue related to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*
39. Respondent waives any right it may have pursuant to 40 C.F.R. § 22.8 to be present during any discussions with, or to be served with and reply to, any memorandum or communication addressed to EPA officials where the purpose of such discussion, memorandum, or communication is to persuade such official to accept and issue this CA/FO.
40. Respondent waives any and all remedies, claims for relief, and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this CA/FO, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.
41. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of RCRA.
42. Respondent, by signing this CA/FO, certifies that Respondent's facilities are currently in compliance with RCRA and the authorized State hazardous waste program.
43. The parties agree that compliance with the terms of this CA/FO shall resolve the violation alleged and the facts stipulated to in this CA/FO, as well as the findings in the CEI Report.

44. Each party will pay its own costs and attorneys' fees.

VI. PAYMENT OF CIVIL PENALTY

45. Respondent consents to the payment of a civil penalty in the amount of FIVE THOUSAND SEVEN HUNDRED DOLLARS (\$5,700), which is to be paid within thirty (30) calendar days of the effective date of this CA/FO.
46. Payment(s) shall be made by cashier's check, certified check, by electronic funds transfer (EFT), or by Automated Clearing House (ACH) (also known as REX or remittance express). If paying by check, the check shall be payable to: **Treasurer, United States of America**, and the Facility name and docket number for this matter shall be referenced on the face of the check. If Respondent sends payment by the U.S. Postal Service, the payment shall be addressed to:

United States Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

If Respondent sends payment by non-U.S. Postal express mail delivery, the payment shall be sent to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines & Penalties
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, Missouri 63101
(314) 425-1818

If paying by EFT, Respondent shall transfer the payment to:

Federal Reserve Bank of New York
ABA: 021030004
Account Number: 68010727
SWIFT address: FRNYUS33
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

If paying by ACH, Respondent shall remit payment to:

US Treasury REX / Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 – checking
Physical location of US Treasury facility:

5700 Rivertech Court
Riverdale, Maryland 20737
Contact: Craig Steffen, (513) 487-2091
REX (Remittance Express): 1-866-234-5681

47. Respondent shall submit a copy of the payment to the following individuals:

Regional Hearing Clerk
U.S. EPA - Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

And to:

Daryl R. Himes, Environmental Engineer
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
US EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909

48. If Respondent fails to remit the civil penalty as agreed to herein, the EPA is required to assess interest and penalties on debts owed to the United States and a charge to cover the costs of processing and handling the delinquent claim. Interest, at the statutory judgment rate provided for in 31 U.S.C. § 3717, will therefore begin to accrue on the civil penalty if not paid within 30 calendar days after the effective date of this Consent Agreement or, if paying in installments, not paid in accordance with the installment schedule provided above. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue:
- a. Interest. Any unpaid portion of a civil penalty or stipulated penalty must bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will therefore begin to accrue on a civil penalty or stipulated penalty if it is not paid by the last date required. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 4 C.F.R. § 102.13(c).
 - b. Monthly Handling Charge. Respondent must pay a late payment handling charge of fifteen dollars (\$15.00) on any late payment, with an additional charge of fifteen dollars (\$15.00) for each subsequent thirty (30) calendar-day period over which an unpaid balance remains.
 - c. Non-Payment Penalty. On any portion of a civil penalty or a stipulated penalty more than ninety (90) calendar days past due, Respondent must pay a non-payment penalty of six percent (6%) per annum, which will accrue from the date the penalty payment became due and is not paid. This non-payment is in addition to charges which accrue or may accrue under subparagraphs (a) and (b).
49. Penalties paid pursuant to this CA/FO are not deductible for federal purposes under 26 U.S.C. § 162(f).

VII. PARTIES BOUND

50. This CA/FO shall be binding on Respondent and its successors and assigns. Respondent shall cause its officers, directors, employees, agents, and all persons, including independent contractors, contractors, and consultants acting under or for Respondent, to comply with the provisions hereof in connection with any activity subject to this CA/FO.
51. No change in ownership, partnership, corporate or legal status relating to the Facility will in any way alter Respondent's obligations and responsibilities under this CA/FO.
52. The undersigned representative of Respondent hereby certifies that she or he is fully authorized to enter into this CA/FO and to execute and legally bind Respondent to it.

VIII. RESERVATION OF RIGHTS

53. Notwithstanding any other provision of this CA/FO, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority, should the EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at Respondent's Facility may present an imminent and substantial endangerment to human health or the environment.
54. Complainant reserves the right to take enforcement action against Respondent for any future violations of RCRA and the implementing regulations and to enforce the terms and conditions of this CA/FO.
55. Except as expressly provided herein, nothing in this CA/FO shall constitute or be construed as a release from any civil or criminal claim, cause of action, or demand in law or equity for any liability Respondent may have arising out of, or relating in any way to, the storage, transportation, release, or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from Respondent's Facility.

IX. OTHER APPLICABLE LAWS

56. All actions required to be taken pursuant to this CA/FO shall be undertaken in accordance with the requirements of all applicable local, state, and Federal laws and regulations. Respondent shall obtain or cause its representatives to obtain all permits and approvals necessary under such laws and regulations.

X. SERVICE OF DOCUMENTS

57. A copy of any documents that Respondent files in this action shall be sent to the following attorney who represents the EPA in this matter and who is authorized to receive service for the EPA in this proceeding:

Joan Redleaf Durbin
Associate Regional Counsel
Office of RCRA/CERCLA Legal Support
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-8530

58. A copy of any documents that Complainant files in this action shall be sent to the following individual who represents Respondent in this matter and who is authorized to receive service for Respondent in this proceeding:

Peter Nichols
President
SNF Holding Company
1 Chemical Plant Road
Riceboro, Georgia 31323

XI. SEVERABILITY

59. It is the intent of the parties that the provisions of this CA/FO are severable. If any provision or authority of this CA/FO or the application of this CA/FO to any party or circumstances is held by any judicial or administrative authority to be invalid or unenforceable, the application of such provisions to other parties or circumstances and the remainder of the CA/FO shall remain in force and shall not be affected thereby.

XII. EFFECTIVE DATE


60. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

In the matter of SNF Holding Company, Docket No. RCRA-04-2017-4002(b):

AGREED AND CONSENTED TO:

SNF Holding Company

By:



Peter Nichols
President

Dated:

Jan 26, 2017

United States Environmental Protection Agency

By:


Larry Lamberth
Chief, Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Dated:

02/13/17

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**


IN THE MATTER OF:)	DOCKET NO.: RCRA-04-2017-4002(b)
)	
SNF Holding Company)	
674 Chemical Plant Road)	Proceeding Under Section 3008(a) of the
Riceboro, Georgia 31323)	Resource Conservation and Recovery Act,
EPA ID No.: GAR 000 004 325)	42 U.S.C. § 6928(a)
)	
Respondent)	
_____)	

FINAL ORDER

The foregoing Consent Agreement is hereby approved, ratified and incorporated by reference into this Final Order in accordance with the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, 40 C.F.R. Part 22. Respondent is hereby ORDERED to comply with all of the terms of the foregoing Consent Agreement effective immediately upon filing of this Consent Agreement and Final Order with the Regional Hearing Clerk. This Order disposes of this matter pursuant to 40 C.F.R. §§ 22.18 and 22.31.

BEING AGREED, IT IS SO ORDERED this 15th day of February 2017.

BY:


Tanya Floyd
Regional Judicial Officer
EPA Region 4

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the original and a true and correct copy of the foregoing Consent Agreement and the attached Final Order (CA/FO), in the Matter of SNF Holding Company, Docket Number: RCRA-04-2017-4002(b), and have served the parties listed below in the manner indicated:

Joan Redleaf Durbin
Associate Regional Counsel
Office of RCRA/CERCLA Legal Support
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

(Via EPA's electronic mail)

Quantindra Smith
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

(Via EPA's electronic mail)

Peter Nichols
President
SNF Holding Company
1 Chemical Plant Road
Riceboro, Georgia 31323

(Via Certified Mail - Return Receipt
Requested)

Date:

2-16-17



Patricia A. Bullock
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9511

Facility Name: **SNF – Riceboro**
City: Riceboro
County: Liberty
AIRS #: 04-13-179-00011

Application #: TV-17683
Date Application Received: September 19, 2007
Permit No: 2899-179-0011-V-02-0

Program	Review Engineers	Review Managers
SSPP	Heather Cottrell	David Matos
ISMP	Marcus Cureton	Richard Taylor
SSCP	Lewis Hays	Douglas Waldron
Toxics	Sherry Waldron	Karen Hays
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **SNF – Riceboro** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: SNF – Riceboro

2. Parent/Holding Company Name

SNF Holding Company

3. Previous and/or Other Name(s)

SNF – Riceboro is the combination of three plants. At the time the initial Title V was issued these plants were called Bio-Flocryl, Inc., NCF Manufacturing, Inc., and Chemtall Incorporated. Additionally, Bio-Flocryl, Inc. was previously known as Flocryl, Inc. and Chemtall Incorporated was previously known as Riceboro Chemical Company. The facility is now referring collectively to the Bio-Flocryl, Inc. and NCF Manufacturing, Inc. portions of the site as Flocryl, Inc. The subname of Chemtall Incorporated for the Chemtall portion of the site has not changed.

4. Facility Location

The facility is located at Chemical Plant Road, Riceboro, Georgia, 31323, Liberty County.

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

AFS No. 179-00011 SNF – Riceboro

Previous AFS Nos. 179-00011 Chemtall Incorporated; Flocryl, Inc. (179-00023 NCF Manufacturing, Inc. and 179-00028 Bio-Flocryl, Inc.)

The plant sections known as Chemtall Incorporated and Flocryl, Inc. (previously NCF Manufacturing and Bio-Flocryl) are treated as one site for the purposes of Title V and are collectively called SNF – Riceboro. All of the manufacturing sites are adjacent and are under common control. The facility has submitted a single renewal application that includes all equipment at the SNF – Riceboro Title V site. The Title V operating permit continues to refer to equipment using the “NCF” and “Bio-Flocryl” designations.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2899-179-0011-V-01-0	March 19, 2003	Initial Title V permit.
Off-Permit Change	November 10, 2003	Installation of Emulsion Line EM31 and various wastewater treatment chemical processes.
2899-179-0011-V-01-1	February 24, 2004	502(b)(10) Change for reconstruction of Powder Plant Line 3.
Off-Permit Change	July 1, 2004	Production of alternative cationic monomers in existing equipment and the installation of new tanks.

2899-179-0011-V-01-2	July 7, 2004	Addition of Dispersant Product Lines DP01 – DP04 with scrubber SE3A/B and Tanks T624 – T631; the change in control device for Emulsion Lines EM51 – EM62; the addition of Tank TAC9; the addition of Emulsion Line EM31; the update of the permit with respect to 40 CFR 60 Subpart Kb and 40 CFR 63 Subpart G applicability; the change in contents of Tanks BT1 and BT2; the increase in the allowable emission rate of acrylic acid from Emulsion Plant Stack (SE19); the update in methanol test methods for Boiler B2; the addition of general applicability statements for 40 CFR 63 Subpart FFFF; the update of template conditions 4.1.1, 4.1.2, and 8.14.1; and the update of the insignificant activity lists in Appendix B of the permit.
Off-Permit Change	September 22, 2004	Production of MADAM in the continuous ADAM Plant.
2899-179-0011-V-01-3	December 16, 2004	The installation of Powder Plant Lines P10 and P11 with associated dryers and baghouses. The amendment was also for the change in monitoring parameters for the Chloromethylation Plant venturi/quench system, the change in monitoring frequency for the Mannich/NMA Scrubbers, and the addition of alternative fuel monitoring requirements for Boilers B7CH, B8CH, B9CH, B10C, and B11C.
Off-Permit Change	January 5, 2005	Installation of a scrubber at the Emulsion Plant.
2899-179-0011-V-01-4	Drafted June 13, 2006	See the description for Amendment No. 2899-179-0011-V-01-7. This amendment was revoked by the seventh amendment.
Off-Permit Change	April 4, 2007	Installation of product quality dryers and additional control equipment at the Powder Plant.
Off-Permit Change	April 16, 2007 October 10, 2007	Copolymer drum dryers and associated equipment and new baghouses.
2899-179-0011-V-01-5	Drafted January 29, 2008	See the description for Amendment No. 2899-179-0011-V-01-7. This served as the draft version of the seventh amendment.
2899-179-0011-V-01-6	May 12, 2008	502(b)(10) for the installation and operation of a thermal oxidizer.
2899-179-0011-V-01-7	July 34, 2008	The modifications proposed in Application No. 15963 including addition of production flexibility for the permitted Dispersant Product Line equipment, installation of three new emulsion/solution polymer manufacturing lines, installation of three new packed tower scrubbers, installation of associated storage tanks, the inclusion of past off-permit changes, and the change in source codes for existing equipment. The permit is also for the modification proposed in Application No. 17096 including the addition of dehumidified air dryers for Powder Plant Lines P1, P2, P4, P8, and P9; the addition of flash dryer sections on Powder Plant Lines P5, P6, and P7 to increase production; the installation of miscellaneous Powder Plant baghouses; the change in the methyl chloride rail car fittings; the change in storage for existing tanks; the removal of Carbon Beds C11 through C14; and the inclusion of off-permit changes.
2899-179-0011-V-01-8	October 29, 2008	Amendment for two new boilers and the combustion of methanol in existing boilers.

D. Process Description

1. SIC Codes(s)

2899 – Chemicals and Chemical Preparations, Not Elsewhere Classified;
2869 – Industrial Organic Chemicals, Not Elsewhere Classified; and
2821 – Plastics Materials, Synthetic Resins, and Nonvulcanizable Elastomers.

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

SNF - Riceboro produces wastewater treatment chemicals and acrylamide.

3. Overall Facility Process Description

Chemtall Process Description

Chemtall produces water treatment chemicals. Major products include emulsion polymers and powder polyacrylamide flocculants. The facility currently consists of a chloromethylation plant, emulsion plants, powder plants, liquids product lines, a Mannich polymer process, a n-methylacrylamide process, copolymer drum drying process lines, a surfactant manufacturing process, and miscellaneous solution/polymer processes. The facility also contains boilers, cooling towers, and other related support equipment.

Raw Material Handling and Storage

Raw materials are received by rail or by truck, or if they are received from the adjacent Flocryl operations, they are pumped directly to Chemtall's storage tanks. Major raw materials include acrylic acid, acrylamide, methyl chloride, dimethyl sulfate, dimethylamine, formaldehyde, dimethylaminoethyl acrylate (ADAM), and dimethylaminoethyl methacrylate (MADAM). Other raw materials stored in tanks include surfactants, aliphatic oils, ammonium hydroxide, caustic, nitrogen and water. In addition, several raw materials are also received in bags, drums, and/or totes. Products include cationic monomers and emulsified polyacrylamide polymers that are stored in tanks. Polyacrylamide powder products are stored in super sacks and/or bags.

Chloromethylation Plant

The chloromethylation plant produces cationic monomer products that are later used in the emulsion or powder plants or are sold as products. The cationic monomer products are produced through either chloromethylation, sulfomethylation, chlorobenzoylation, or salification of cationic monomer (ADAM or MADAM). There are currently five batch lines and two continuous lines. All process lines vent to an incinerator, which vents to a scrubber. There is also a back-up incinerator and scrubber.

Chloromethylation, sulfomethylation, chlorobenzoylation, and salification can be performed in the batch lines. In the chloromethylation process methyl chloride, water, and amine monomer (ADAM or MADAM) are mixed in a water-cooled reactor. In the sulfomethylation and the chlorobenzoylation processes, water, aliphatic oil, and cationic monomer (ADAM or MADAM) are first mixed in a reactor and then either dimethyl sulfate or benzyl chloride is added until the reaction is complete. In the salification process, water, sulfuric acid, and cationic monomer (ADAM or MADAM) are mixed together in a water-cooled mix tank. Both continuous lines are used for chloromethylation of ADAM and MADAM. The chloromethylation plant may use other cationic monomers and may use other quaternizing agents and acids in addition to those discussed above.

Emulsion Plant

The emulsion plant produces cationic, anionic, and nonionic polyacrylamide polymers. In the case of cationic polymers, acrylamide and cationic monomers are combined. In the case of anionic polymers, acrylamide and anionic monomers and a base, such as sodium hydroxide, are combined. For nonionic polymers, acrylamide homopolymer is used. There are numerous surfactants, bases, catalysts, aliphatic oils, and other process additives that can be used to produce a range of cationic, anionic, and nonionic polymer emulsions.

Typically, smaller quantity ingredients such as catalysts, process additives, and surfactants are pre-measured in weigh tanks with load cells. The reactants are then premixed. After mixing and dissolving additional reagents are added, the materials are heated, and polymerization occurs. When the reaction is completed, the reactor contents are transferred to an incorporation tank where more surfactant is added. From the incorporation tank the polymer emulsion is passed through a filter to remove solids. A typical emulsion line includes a reactor with associated weigh/mix tanks, a dissolution tank, and an incorporation tank but vessels in a line may vary depending on the final product. The facility uses a number of scrubbers to control emissions from the emulsion plant.

Solution Polymer Process

In addition to emulsion polymers, the emulsion plant equipment is used to produce a variety of solution polymers including dispersants, dry strength polymers, and wet strength polymers. Dispersants are produced by reacting acrylic acid, water, and catalysts and then neutralizing the product with a base such as ammonium hydroxide or caustic. Dry strength polymers are produced by reacting water, acrylamide, acrylic acid, caustic, and catalyst if necessary. Wet strength polymers are made in a two step process that involves a cross-linking reaction.

Emulsion Concentration

Emulsions are transferred from reactors to storage tanks prior to concentration. The emulsions are then sent to one of two steam or electrically heated evaporators.

Powder Plants

The powder plants produce polyacrylamide powder flocculants. The major raw materials for the powders are acrylamide, acrylic acid, cationic monomers, sodium hydroxide, and water. In addition to these major raw materials other chemicals are used in small quantities, either as catalysts, process aids, or product additives. The three main types of powder flocculants produced in the powder plant are: nonionic (uses acrylamide only), anionic (uses acrylamide, acrylic acid, and sodium hydroxide), and cationic (uses acrylamide and cationic monomer).

The process involves transferring the raw materials to a dissolution tank where the liquids are cooled and mixed. The tank contents are then transferred to a reactor. In the reactor, the liquid mixture is purged with nitrogen and catalysts are added to start the polymerization. The polymerization process turns the reactor contents into a gel. The gel is dumped into a pregrinder that grinds the gel into lumps, and a granulator where the lumps are further ground into small particles. The powder is then pneumatically conveyed to a natural gas-fired dryer with integral cyclones. Powder recovered in the cyclones is returned to the process. Depending on the process line, there may be one, two or three dissolution tanks, one, two, four, or six reactors, and one or two pregrinders.

Product from the dryer is conveyed to either one or two product cyclones. Powder from each product cyclone passes through a screening operation. Oversized product is typically processed through either one or two roller mills in parallel and returned to the system. Fines may be either packaged in bags or conveyed to a fines cyclone that discharges product into the system for additional agglomeration. Product from the screening operation that is appropriately sized discharges into one, two, or three accept hoppers. Material from the accept hoppers may be directly bagged, or it may pass through one, two, or three ribbon blenders and a screening operation prior to being bagged. Depending on the products being produced, powder plants may be equipped with up to five bag filters on product cyclones, fines cyclones, and bagging operations. The number of bag filters in a particular powder plant and the configuration, including the pickup points and whether they are connected in parallel, will be changed periodically depending upon product mix and market demand. Powder plants may also have a rebagging operation that consists of accept hoppers followed by ribbon blenders, screening, and bagging operations. The rebagging operation may or may not be equipped with a bag filter, depending on the products being handled. The polyacrylamide product may also be packaged as a gel. In this case, the polymer gel from the pregrinder or from the first dryer section may be packaged directly without further drying, grinding, or screening.

Liquids Product Lines

Thirteen liquids product lines are capable of producing emulsion polymers, solution polymers, dispersants (processed with either water or isopropanol), dry strength polymers, and wet strength polymers. A typical production line includes a reactor with associated weigh/mix tanks and a dissolution tank. In addition, some dissolution tanks may be shared between reactors and/or dissolution will sometimes be completed directly in the reactor. The facility uses scrubbers to control emissions from the liquids product lines.

Mannich Polymer Production

The production of Mannich polymer consists of three major production processes: polyacrylamide (PAM), dimethylaminomethanol (DMAM), and Mannich polymer. The raw materials for producing PAM are acrylamide, tetramethylenediamine, and ammonium persulfate. Acrylamide is stored in a storage tanks while tetramethylenediamine and ammonium persulfate are received in bags. After producing PAM in a preparation tank, the material is transferred to a reactor.

The raw materials that form DMAM, dimethylamine and formaldehyde, are typically received by rail car. Dimethylamine is stored in a pressure vessel. Formaldehyde is stored in atmospheric tanks. The DMAM is produced in a reactor by mixing the raw materials and water. Both processes involve reacting the raw materials along with water. To produce Mannich polymer, PAM and DMAM are mixed together with water in one of the two Mannich reactors. The finished product is transferred to a storage tank until it is transferred off-site in trucks. The facility uses scrubbers to control emissions from the various steps of the Mannich process.

NMA Production

N-methylolacrylamide (NMA) is produced by reacting acrylamide and formaldehyde together in a batch reactor. Product from the reactor is stored in above ground storage tanks. The facility uses scrubbers to control the NMA process emissions and to control emissions from raw material and storage tanks associated with the process.

Drum Drying Process

The facility operates copolymer drum drying process lines for the purpose of drying copolymer produced in the emulsion plant, liquids plant, or Mannich area. The process involves feed tanks routed to a steam drum dryer followed by sizing equipment (hammer mill, blender, and screen) and bagging operations. Product recovery dust collectors receive product after the hammer mill and before being passed to the blender.

Spray Dryer

The spray dryer is utilized to remove moisture from plant wastewaters including, but not limited to, washwater and washwater evaporator concentrate. The spray dryer receives wastewater (on the order of 30 percent solids by weight) from various parts of the plant. The unit is equipped with a natural gas fired burner and vents to a cyclone and baghouse to remove solids from the exhaust gas and to control particulate matter emissions. Solids from the spray dryer chamber, cyclone, and baghouse are collected in hoppers and / or roll-off boxes for subsequent disposal.

Boilers

The facility is permitted to operate seven natural gas fired boilers. Several of the boilers are capable of firing propane as a backup fuel.

Flocryl Acrylates Plant

The Flocryl Acrylates facility includes a cationic monomer manufacturing facility (formerly NCF Manufacturing, Inc.) that produces water treatment intermediate chemicals, specifically ADAM and MADAM. The facility consists of four batch processing trains, two batch methanol recovery areas, and a continuous plant.

Raw Material Handling and Storage

Raw materials are received by rail or by truck and are held in the permitted storage tanks. Major raw materials include methyl acrylate (MA), methyl methacrylate (MMA), dimethylaminoethanol (DMOH), and hexane.

Batch Process

The reaction step is a batch transesterification with a reactant ester (MA or MMA) reacting with an alcohol (DMOH) to produce the product ester (ADAM or MADAM) plus a co-product alcohol (methanol). To begin the batch process the raw materials are reacted and the product is pumped to a distillation step. The distillation step consists of a kettle reboiler, distillation column, and other associated equipment. The product is distilled into various fractions and the fractions are either returned for additional processing or sent to storage. Small amounts of polymerization inhibitors are used in the process. The inhibitor solutions are made-up in small mix vessels. The facility includes two methanol recovery systems. The methanol stream from the reactor distillation is sent to one of two storage tanks and then is pumped to one of two batch reactor / distillation steps.

Continuous Process

In the continuous process, the reaction step is a continuous transesterification with a reactant ester (MA) reacting with an alcohol (DMOH) to produce the product ester (ADAM) and a co-product alcohol (methanol). The continuous process also includes a product distillation step and a methanol recovery step.

Boilers

The facility is permitted to operate seven boilers with the Flocryl Acrylates process. The boilers are permitted to burn natural gas, propane, and methanol co-product.

Flocryl Acrylamide Plant

The Flocryl Acrylamide Plant uses a unique biocatalyst to produce acrylamide. The facility is permitted to operate four acrylamide trains/lines. The raw materials for the process include acrylonitrile, catalyst gel slurry, sodium acrylate, acrylic acid, and sodium hydroxide.

Catalyst Preparation

Prior to use, a weak aqueous sodium acrylate solution is added to the catalyst gel to clean and slurry the catalyst. Wastewater from the cleaning process is sent to the existing wastewater treatment facilities.

Reaction

The reactor is a continuous type flow reactor that is divided into zones. Catalyst, acrylonitrile, dilute sodium acrylate solution, and water are continuously fed to the reactor. Sodium hydroxide is added as needed to maintain proper pH. The reactor effluent containing 50 percent acrylamide in water along with trace acrylonitrile (less than 100 ppm) and spent catalyst is discharged to the effluent reactor tanks.

Reactor effluent is pumped to the product receiver prior to undergoing catalyst separation and further filtration. Waste catalyst is also withdrawn from the bottom of the reactor and transferred to the catalyst particle separation process. During start-up, the initial effluent from the product receiver flows into the effluent holding receivers and is later blended back into the process. The vents from the reactors, effluent reactor tanks, and catalyst filters are routed to scrubbers.

Catalyst Separation and Product Filtration

The catalyst separation process uses filters to absorb and remove protein and bacteria cells that escape from the catalyst. The liquid separated from the catalyst is either returned to the reactor or sent to the unfiltered acrylamide tanks where dilute acrylic acid is added. The liquid is then sent to the product receivers. The vents from the unfiltered acrylamide tanks and product receivers are controlled with scrubbers. Unfiltered acrylamide is filtered to remove the remaining bacteria cells. Waste from the filters is disposed of off-site. Filtered acrylamide from the reactor lines is moved to the day storage tanks for quality analysis and quality control purposes. The filtered product from the reactor lines is stored in the acrylamide product storage tanks prior to either sale to off-site customers or transferred to existing SNF processes. The acrylamide product storage tanks are vented to a scrubber.

Catalyst Particle Separation

Waste catalyst particles from the bottom of the reactors are separated from the catalyst slurry by first draining/washing the liquid from the particles. Waste catalyst particles are disposed of off-site and the liquid is returned to the process.

4. Overall Process Flow Diagram

The facility provided process flow diagrams with their electronic Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is classified as a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- The production of IPA-dispersants in Liquids Product Lines 1 through 12 (Source Codes LQ01 through LQ12) is limited to 262,800 tons per consecutive twelve-month period.
- Scrubber CE4A/4B must reduce inlet emissions of sulfur dioxide by at least 96 percent.
- The emissions of sulfur dioxide from Liquids Product Lines 1 through 12 (Source Codes LQ01 through LQ12) must not equal or exceed 40 tons during any consecutive twelve-month period.
- The production of IPA-dispersants in Liquids Product Line 13 (Source Code LQ13) is prohibited.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The SNF – Riceboro facility is subject to the following MACT Standards:

- 40 CFR Part 63 Subpart F - National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for the operation of the Bio-Flocryl Plant.
- 40 CFR Part 63 Subpart G - National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater for the operation of the Bio-Flocryl Plant.
- 40 CFR Part 63 Subpart H - National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks for the operation of the Bio-Flocryl Plant.
- 40 CFR Part 63 Subpart B - Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j) for the operation of the Flocryl Acrylates Continuous Plant.
- 40 CFR 63 Subpart UU – National Emissions Standards for Equipment Leaks – Control Level 2 Standards for the operation of the Flocryl Acrylates Continuous Plant, the Flocryl Acrylates Batch Plant and the Chemtall Plant.
- 40 CFR Part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing for the Flocryl Acrylates Continuous Plant, the Flocryl Acrylates Batch Plant, and the Chemtall Plant.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 2899-179-0011-V-02-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

The facility has indicated compliance with the provisions in Part 2.0 of the permit.

D. Operational Flexibility

None applicable.

E. Permit Conditions

The following table lists the conditions that appear in Part 2.0 of the renewal permit. Many conditions have been carried over from the previous permit/amendments and some conditions have been added. Citations and the formatting of conditions have been updated as needed. Information concerning conditions from the initial permit is discussed in the narrative for Air Quality Permit No. 2899-179-0011-V-01-0.

Renewal Condition	Original Condition		Notes
	Number	Permit	
2.2.1	2.2.1	Initial	The plant names in the condition have been updated as necessary.

III. Regulated Equipment Requirements

A. Brief Process Description

Please see Section I.D.3 of this narrative.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
BIO-FLOCERYL PLANT					
BIOF – Bio-Floceryl Processes					
V1	Bio-Floceryl Train 1	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.1, 3.3.6, 3.3.57 through 3.3.59, 5.2.2, 6.1.7, 6.2.1 through 6.2.3, and 6.2.6*	C301 C302	Packed-Bed Scrubbers
V2	Bio-Floceryl Train 2	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.1, 3.3.6, 3.3.57 through 3.3.59, 5.2.2, 6.1.7, 6.2.1 through 6.2.3, and 6.2.6*	C303 C304	Packed-Bed Scrubbers
V3	Bio-Floceryl Train 3	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.1, 3.3.6, 3.3.57 through 3.3.59, 5.2.2, 6.1.7, 6.2.1 through 6.2.3, and 6.2.6*	C305 C306	Packed-Bed Scrubbers
V4	Bio-Floceryl Train 4	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.1, 3.3.6, 3.3.57 through 3.3.59, 5.2.2, 6.1.7, 6.2.1 through 6.2.3, and 6.2.6*	C307 C308	Packed-Bed Scrubbers
BIOO – Bio-Floceryl Miscellaneous Processes					
V404 V408 V410 V412 V414 V416 V418 V420 V422 V424	Acrylamide Product Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.2, 3.3.6, 3.3.57 through 3.3.59, 5.2.2, 6.1.7, 6.2.1, 6.2.3, 6.2.4, and 6.2.6*	CAPS	Packed-Bed Scrubber
V417 V419 V421 V423 V425 V427 V429 V431 V433 V435 V437 V439 V441 V443 V445 V447	Day Storage Acrylamide Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.2, 3.3.6, 3.3.57 through 3.3.59, 6.2.1, 6.2.3, 6.2.4, and 6.2.6*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EG10 EG11	Ethylene Glycol Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.2, 3.3.6, 3.3.57 through 3.3.59, 6.2.1, 6.2.3, 6.2.4, and 6.2.6*	None	None
FGBF – Fugitive Emissions from Equipment Leaks for Bio-Flocryl					
FAOB FFLB FFOB FPLB FPOB FRVB FVLB FVOB	Agitators Flanges Flanges Pumps Pumps Pressure Relief Devices Valves Valves	40 CFR 63 Subpart F 40 CFR 63 Subpart H	3.3.5, 3.3.6, 3.3.29 through 3.3.40, 3.3.57 through 3.3.60, 4.2.15, 6.2.1, 6.2.3, 6.2.6, and 6.2.34 through 6.2.41*	None	None
Other					
N/a	Transfer Rack Operations for Acrylamide	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.3, 3.3.6, 3.3.57 through 3.3.59, 6.2.1, 6.2.3, 6.2.5, and 6.2.6*	None	None
N/a	Maintenance Wastewaters – Acrylamide Equipment and Plant Maintenance / Catalyst Rinse Process Maintenance	40 CFR 63 Subpart F	3.3.4, 3.3.6, 3.3.57, 3.3.58, 6.2.1, 6.2.3, 6.2.6, and 6.2.27*	None	None
N/a	Acrylonitrile Unloading / Stormwater and Firefighting Deluge	None	None*	None	None
FLOCRYL ACRYLATES CONTINUOUS PLANT					
NCFC - Floeryl Acrylates Continuous Process					
R501	Transesterification Reactor / Column (including decanting)	40 CFR 63 Subpart B ² 40 CFR 60 Subpart NNN 40 CFR 60 Subpart RRR	3.3.7, 3.3.56, 3.3.57, 3.3.61 through 3.3.63, 5.2.1, 6.1.7, and 6.2.7 through 6.2.9*	C51B	Condenser
R502	Transesterification Reactor / Column (including decanting)	40 CFR 63 Subpart B ² 40 CFR 60 Subpart NNN 40 CFR 60 Subpart RRR	3.3.7, 3.3.56, 3.3.57, 3.3.61 through 3.3.63, 5.2.1, 6.1.7, and 6.2.7 through 6.2.9*	C52B	Condenser
R500	Saponification Reactor / Methanol Recovery	40 CFR 63 Subpart B ² 40 CFR 60 Subpart NNN 40 CFR 60 Subpart RRR	3.3.7, 3.3.56, 3.3.57, 3.3.61 through 3.3.63, 5.2.1, 6.1.7, and 6.2.7 through 6.2.9*	C522	Condenser
D503	Product Distillation	40 CFR 63 Subpart B ²	3.3.57 and 3.3.63*	None	None
T520	Crude Ester Tank	40 CFR 63 Subpart B ¹	3.3.8, 3.3.10, 3.3.57, 3.3.63, 5.2.1, 6.1.7, and 6.2.10 through 6.2.12*	C520	Condenser
T522	Azeotrope Tank	40 CFR 63 Subpart B ²	3.3.10, 3.3.57, 3.3.63, 5.2.1, 6.1.7, and 6.2.12*	C522	Condenser
T523	Recycle Reactant Tank	40 CFR 63 Subpart B ²	3.3.10, 3.3.57, 3.3.63, and 6.2.12*	None	None
T540	Methanol Co-Product Tank	40 CFR 63 Subpart B ²	3.3.9, 3.3.10, 3.3.57, 3.3.63, 5.2.1, 6.1.7, and 6.2.12	None	None
T30A T30B	Check Tanks	None	None*	None	None
FUGC - Fugitive Emissions from Equipment Leaks for Floeryl Acrylates Continuous Plant					
FALN FBH FFLH FFLN FPLH FPLN FRVN FRVH FVLH FVLN FVON	Agitators Bottoms Receivers Flanges Flanges Pumps Pumps Pressure Relief Devices Pressure Relief Devices Valves Valves Valves	40 CFR 63 Subpart B (40 CFR 63 Subpart UU) 391-3-1-.02(9)(b)(16)	3.3.14, 3.3.41 through 3.3.54, 3.3.57, 3.3.63, 4.2.16, and 6.2.42 through 6.2.46*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Other					
N/a	Process Wastewaters	40 CFR 63 Subpart B ²	3.3.11, 3.3.57, 3.3.63, and 6.2.26*	None	None
N/a	Maintenance Wastewaters	40 CFR 63 Subpart B	3.3.12, 3.3.57, 3.3.63, and 6.2.27*	None	None
N/a	Open System Liquid Streams	40 CFR 63 Subpart B	3.3.13, 3.3.57, 3.3.63, 5.2.3, 6.1.7, and 6.2.13*	None	None
FLOCRYL ACRYLATES BATCH PLANT					
NCFB – Flocryl Acrylates Batch Process					
R1-R4 D1-D4 M1-M2 T300 T620 T303 T621 T304 T306 T208 T406	Batch Reactor Trains 1–4 Product Distillation Trains 1–4 No. 1 and 2 Methanol Purification Processes Methanol-Water Tanks Methanol-Acrylate Tanks Methanol Co-Product Tank Methanol Wash Tank Shutdown Tanks	40 CFR 63 Subpart FFFF ¹	3.3.15, 3.3.23, 3.3.24, 3.3.28, 3.3.57, 3.3.65, 4.2.1, 4.2.14, 5.2.1, 5.2.9, 6.1.7, 6.2.23 through 6.2.25, and 6.2.28 through 6.2.33*	TO01	Thermal Oxidizer
T220 T221	Methanol Co-Product Tanks	40 CFR 63 Subpart FFFF ¹	3.3.16, 3.3.23, 3.3.24, 3.3.28, 3.3.57, 3.3.65, 4.2.1, 4.2.14, 5.2.1, 5.2.9, 6.1.7, 6.2.23 through 6.2.25, and 6.2.28 through 6.2.33*	TO01	Thermal Oxidizer
T200 T404 T204 V550	MMA Tank MMA Tank Hexane Tank Catalyst Residue Tank	40 CFR 63 Subpart FFFF ²	3.2.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
IN1 IN2 IN3 IN4	Train 1 – 4 Inhibitor Pots	None	None*	None	None
408A 408B 508A 508B 608A 608B 708A 708B	Train 1 – 4 Process Tanks	None	None*	None	None
FUGB – Fugitive Emissions from Equipment Leaks for Flocryl Acrylates Batch Plant					
FFL FFO FPL FPO FRL FRO FVL FVO	Flanges Flanges Pumps Pumps Pressure Relief Devices Pressure Relief Devices Valves Valves	40 CFR 63 Subpart FFFF (40 CFR 63 Subpart UU) 40 CFR 60 Subpart VV	3.3.18, 3.3.19, 3.3.23, 3.3.41, through 3.3.54, 3.3.56, 3.3.57, 3.3.65, 3.3.67, 4.2.16, 6.2.23 through 6.2.25, and 6.2.42 through 6.2.26*	None	None
Other					
N/a	Methanol Co-Product Transfer Operations	40 CFR 63 Subpart FFFF ¹	3.3.17, 3.3.23, 3.3.57, 3.3.65, and 6.2.23 through 6.2.25*	None	Vapor Balance System
N/a	Process Wastewater	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.25, 3.3.57, 3.3.65, 4.2.13, and 6.3.23 through 6.2.26*	None	None
N/a	Maintenance Wastewater	40 CFR 63 Subpart FFFF	3.3.23, 3.3.26, 3.3.57, 3.3.65, 6.2.23 through 6.2.25, and 6.2.27*	None	None
N/a	Cooling Tower System	40 CFR 63 Subpart FFFF	3.3.23, 3.3.27, 3.3.57, 3.3.65, 5.2.10, and 6.2.22 through 6.2.25*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
CM – Chloromethylation Plant					
CM1 through CM7	Chloromethylation Lines 1 – 7 (Batch Lines 1 – 5 and Continuous Lines 6 and 7)	40 CFR 63 Subpart FFFF ¹ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.20, 3.3.21, 3.3.23, 3.3.24, 3.3.28, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 3.5.1, 4.2.2, 4.2.14, 5.2.1, 5.2.2, 5.2.8, 5.2.9, 6.1.7, 6.2.20, 6.2.23 through 6.2.25, and 6.2.28 through 6.2.33*	CM12 CMS2 CM11 CMS1	Incinerator Scrubber Backup Incinerator Backup Scrubber
PP – Powder Plant					
P1	Powder Plant Line 1	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP1A through CP1E	Baghouses
P2	Powder Plant Line 2	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP2A through CP2E	Baghouses
P3	Powder Plant Line 3	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP3A through CP3E CP3F	Baghouses
P4	Powder Plant Line 4	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP4A through CP4D	Baghouses
P5	Powder Plant Line 5	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.3, 3.4.4, 4.2.3, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP5A through CP5F	Baghouses
P6	Powder Plant Line 6	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.3, 3.4.4, 4.2.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP6A through CP6F	Baghouses
P7	Powder Plant Line 7	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.3, 3.4.4, 4.2.5, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP7A through CP7F	Baghouses
P8	Powder Plant Line 8	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP8A through CP8D	Baghouses
P9	Powder Plant Line 9	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP9A through CP9D	Baghouses
P10	Powder Plant Line 10	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.3, 3.4.3, 3.4.4, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP10A through CP10D	Baghouses
P11	Powder Plant Line 11	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.4, 3.4.3, 3.4.4, 4.2.6, 5.2.2, 5.2.4 through 5.2.7, and 6.1.7*	CP11A through CP11D	Baghouses
EM – Emulsion Plant					
EM1 EM4 EM5	Emulsion Plant Lines 1, 4 and 5	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
EM6 EM7	Emulsion Plant Lines 6 and 7	40 CFR 63 Subpart FFFF ²	3.2.5, 3.3.23, 3.3.57, 3.3.65, 4.2.7, 4.2.13, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	CE5	Packed-Bed Scrubber
EM8	Emulsion Plant Line 8	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
EM9 EM10	Emulsion Plant Lines 9 and 10	40 CFR 63 Subpart FFFF ²	3.2.5, 3.3.23, 3.3.57, 3.3.65, 4.2.7, 4.2.13, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	CE5	Packed-Bed Scrubber
EM11 EM12 EM14 through EM16	Emulsion Plant Lines 11, 12, and 14 – 16	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EM17 through EM20	Emulsion Plant Lines 17 – 20	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, 5.2.2, 6.1.7, and 6.2.23 through 6.2.25*	CES1	Packed-Bed Scrubber
EM21 through EM24	Emulsion Plant Lines 21 – 24	40 CFR 63 Subpart FFFF ²	3.2.6, 3.3.23, 3.3.57, 3.3.65, 4.2.8, 4.2.13, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	CES2	Packed-Bed Scrubber
EM25 through EM26	Emulsion Plant Lines 25 and 26	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
EM27 through EM29 EM31	Emulsion Plant Lines 27 – 29 and 31	40 CFR 63 Subpart FFFF ²	3.2.6, 3.3.23, 3.3.57, 3.3.65, 4.2.8, 4.2.13, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	CES2	Packed-Bed Scrubber
EM32 through EM33	Emulsion Plant Lines 32 and 33	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
EM34 through EM39	Emulsion Plant Lines 34 – 39	40 CFR 63 Subpart FFFF ²	3.2.7, 3.3.23, 3.3.57, 3.3.65, 4.2.9, 4.2.13, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	SE3A SE3B	Two-Stage Packed-Bed Scrubber
EM43 through EM45	Emulsion Plant Mix Tanks M43 – M45	40 CFR 63 Subpart FFFF ²	3.2.5, 3.3.23, 3.3.57, 3.3.65, 4.2.7, 4.2.13, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	CE5	Packed-Bed Scrubber
LQ – Liquids Product Lines					
LQ01 through LQ012	Liquids Product Lines 1 – 12	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.8 through 3.2.11, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.10, 4.2.11, 4.2.13, 5.2.2, 6.1.7, 6.2.16 through 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE4A CE4B	Two-Stage Packed-Bed Scrubber
LQ13	Liquids Product Line 13	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.12, 3.2.13, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.12, 4.2.13, 5.2.2, 6.1.7, 6.2.18, 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE6 CE7	Packed-Bed Scrubbers
DD – Drum Drying Process Equipment					
DD1	Drum Drying Process 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CDD1	Baghouse
DD2	Drum Drying Process 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CDD2	Baghouse
DD3	Drum Drying Process 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CDD3	Baghouse
DD4	Drum Drying Process 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CDD4	Baghouse
NMAN – NMA/Mannich Plant					
MAN RNMA	Mannich Polymer Line RNMA Reactor	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, 5.2.2, 6.1.7, and 6.2.23 through 6.2.25*	SC1 SC2	Packed-Bed Scrubbers
FCG – Fugitive Emissions from Equipment Leaks for Chemtall					
FAOC FFLC FFOC FPLC FPOC FRVC FVLC FVOC	Agitators Flanges Flanges Pumps Pumps Pressure Relief Devices Valves Valves	40 CFR 63 Subpart FFFF (40 CFR 63 Subpart UU)	3.3.22, 3.3.23, 3.3.41 through 3.3.54, 3.3.57, 3.3.65, 4.2.16, 6.2.23 through 6.2.25, and 6.2.42 through 6.2.46*	None	None
Other					
CED1	Spray Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CEB1	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
ACR ACR2 AM11 through AM20 TAM2 TAM4 TAM5 through TAM9 TA10	Acrylamide Tanks	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
TAC1 through TAC9 AC10	Acrylic Acid Tanks	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
TCB1 TDMS	Benzyl Chloride Tank Dimethyl Sulfate Tank	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
EG01 EG02 EG03 EG04 EG05 EG06	Ethylene Glycol Tanks	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
FOR	Formaldehyde Tank	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*	None	None
FOT1 FOT2	Formaldehyde Tanks	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.13, 5.2.2, 6.1.7, and 6.2.23 through and 6.2.25*	SC1	Packed-Bed Scrubber
N/a	Process Wastewater	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.25, 3.3.57, 3.3.65, and 6.2.23 through 6.2.26*	None	None
N/a	Maintenance Wastewater	40 CFR 63 Subpart FFFF	3.3.23, 3.3.26, 3.3.57, 3.3.65, 6.2.23 through 6.2.5, and 6.2.27*	None	None
N/a	Cooling Tower System	40 CFR 63 Subpart FFFF	3.3.23, 3.3.27, 3.3.57, 3.3.65, 5.2.10, and 6.2.22 through 6.2.25*	None	None
OTHER					
BLRS – Boilers					
B1 through B7	Flooded Boilers 1 – 7	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.55, 3.3.56, 3.3.66, 3.4.1, 3.4.2, 5.2.2, 5.2.11, 6.1.7, and 6.2.47*	None	None
B7CH B8CH B9CH B10C B11C	Chemtall Boilers 7 – 11	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.55, 3.3.56, 3.3.66, 3.4.1, 3.4.2, 5.2.2, 5.2.11, 6.1.7, and 6.2.47*	None	None
B12C B13C	Chemtall Boilers 12 – 13	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.55, 3.3.56, 3.3.66, 3.4.1, 3.4.2, 5.2.2, 5.2.11, 6.1.7, and 6.2.47 through 6.2.49*	None	None
Other					
N/a	Roadways	391-3-1-.02(2)(n)	3.4.5, 3.4.6, and 6.2.50*	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

¹Group 1 Source; ²Group 2 Source.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 2899-179-0011-V-02-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Amendments

The SNF-Riceboro facility has gone through several modifications since the issuance of the initial Title V permit. These modifications are summarized in the following paragraphs. References to specific permit condition numbers and descriptions of how conditions were added, modified, or deleted are included in the tables in Sections III.F, IV.B.1, V.B.1, and VI.B of this narrative. Please see Table 1 of this narrative for details regarding the equipment involved with each modification.

Amendment No. 2899-179-0011-V-01-1

There were no rule applicability changes associated with the first amendment.

Amendment No. 2899-179-0011-V-01-2

Due to a change in 40 CFR 60 Subpart Kb by the U.S. EPA, many tanks at the facility were determined to no longer be subject to the subpart. The rule was removed from the equipment list as necessary and a number of the tanks were moved to the Insignificant Activities List in Attachment B of the permit.

It was determined that the Day Storage Acrylamide Tanks and the Ethylene Glycol Tanks at the Bio-Flocryl Plant were subject to 40 CFR 63 Subparts F and G. The permit language was modified accordingly.

The new Dispersant Lines were determined to be subject to Georgia Rules (b) and (e) for opacity and particulate matter and general provisions for limiting the impact of VOC/HAP emissions.

The permit was also modified to include a general applicability statement for 40 CFR 63 Subpart FFFF, which had a compliance date of May 10, 2008.

Amendment No. 2899-179-0011-V-01-3

It was determined that Powder Plant Lines P10 and P11 are subject to Georgia Rules (b) and (e) for opacity and particulate matter and general provisions for limiting the impact of VOC/HAP emissions.

The modifications approved by the amendment did not result in any rule applicability changes.

Amendment No. 2899-179-0011-V-01-6

The amendment involved the installation of control equipment to comply with 40 CFR 63 Subpart FFFF for emissions from the Flocryl Acrylates Batch Plant. The amendment included emission standards, monitoring, and reporting for process and tank vents that are controlled with a thermal oxidizer.

Amendment No. 2899-179-0011-V-01-7

It was determined that the facility would continue to comply with Georgia Rules (b) and (e) for opacity and particulate matter and general provisions for limiting the impact of VOC/HAP emissions for the new and modified Liquids Products process and the modified Powder Plant equipment. The Drum Drying equipment that was previously approved as an off-permit change was also listed as subject to Georgia Rules (b) and (e).

The other changes approved by the amendment did not result in any rule applicability changes.

Amendment No. 2899-179-0011-V-01-8

There were no rule applicability changes for the existing Flocryl Boilers. The new Chemtall Boilers were determined to be subject to Georgia Rules (b), (d), and (g) and federal rule 40 CFR 60 Subpart Dc.

Renewal Application

The Drum Drying equipment that was previously approved as an off-permit change is subject to Georgia Rules (b) and (e).

The major update to the permit involves the incorporation of 40 CFR 63 Subpart FFFF. The purpose of the subpart is the regulation of HAP emissions from miscellaneous organic chemical manufacturing sources. The sources are classified as miscellaneous because they have not appeared in a source category previously regulated under 40 CFR Part 63. The applicability of the rule to the SNF equipment is summarized below:

Bio-Flocryl Plant

It was determined that the Bio-Flocryl Plant is not subject to any provisions under 40 CFR 63 Subpart FFFF. The plant is regulated under 40 CFR 63 Subparts F, G, and H.

Flocryl Acrylates Continuous Plant

The Flocryl Acrylates Continuous Plant is currently regulated under 40 CFR 63 Subpart B (case-by-case MACT) and 40 CFR 60 Subparts NNN and RRR. Because the facility went through a case-by-case MACT determination, it is not required to comply with the regulation until November 10, 2011. The facility will be evaluating specific requirements at a later date; therefore, specific requirements for this plant have not been included in this permit. The permit does include a general applicability statement that states the compliance date.

Flocryl Acrylates Batch Plant

The Flocryl Acrylates Batch Plant has a number of emission points that are subject to 40 CFR 63 Subpart FFFF. In addition to the specific requirements listed below, Subpart FFFF requires the facility to conduct monitoring, maintain records, and submit reports that are used to demonstrate compliance. The controls required by the regulation results in a significant reduction in emissions from the plant. The VOC emission reductions were calculated as 139 tpy VOC and 81 to 139 tpy HAP. The HAP reductions are dependant on the raw materials used in each production run.

- Group 1 Batch Process Vents – The following vents are required to be controlled by at least 98% by weight of organic HAP or to a concentration of 20 ppm TOC or total organic HAP. The facility has complied by installing a thermal oxidizer.
 - Batch Reactor Trains 1-4 (Source Codes R1-R4);
 - Product Distillation Trains 1-4 (Source Codes D1-D4);
 - No. 1 and 2 Methanol Purification Processes (Source Codes M1 and M2);
 - Methanol-Water Tanks (Source Codes T300 and T620);
 - Methanol-Acrylate Tanks (Source Codes T303 and T621);
 - Methanol Co- Product Tank (Source Code T304);
 - Methanol Wash Tank (Source Code T306); and
 - Shutdown Tanks (Source Codes T208 and T406).
- Group 1 Storage Tanks – The following vents are required to be controlled in the same manner as the Group 1 batch process vents. The units are also subject to routine maintenance limits. These sources are also controlled with the thermal oxidizer.
 - Methanol Co-Product Tanks (Source Codes T220 and T221).
- Group 2 Storage Tanks – The following tanks are classified as Group 2 sources and are not required to be equipped with controls.
 - MMA Tanks, Hexane Tank, and Catalyst Residue Tank.
- Leak Detection and Repair – The facility has elected to comply with 40 CFR 63 Subpart UU as allowed by 40 CFR 63 Subpart FFFF for equipment leaks.

- Group 1 Transfer Rack – The facility operates Methanol Co-Product Transfer 1 equipment that is classified as Group 1. The facility has elected to use a vapor balancing system to comply with the subpart.
- Group 2 Process Wastewater and Maintenance Wastewater – The batch operations produce wastewater. The facility is required to comply with a number of record keeping requirements and is not required to install controls.
- Cooling Tower System – The subpart requires the facility to monitor the system for leaks and to maintain a number of records.

Chemtall Plant

The Chemtall Plant has a number of emission points that are subject to 40 CFR 63 Subpart FFFF. In addition to the specific requirements listed below, Subpart FFFF requires the facility to conduct monitoring, maintain records, and submit reports that are used to demonstrate compliance.

- Group 1 Process Vents – The following vents are required to be controlled by at least 98% by weight of organic HAP or to a concentration of 20 ppm TOC or total organic HAP. The facility is also required to control halogen HAP / hydrogen halide by at least 99%, to 0.45 kg/hr or less, or to 20 ppm or less. The facility complies by operating an existing incinerator/scrubber system.
 - Chloromethylation Lines (Source Codes CM1-CM7).
- Group 2 Process Vents – The following sources are classified as Group 2 sources. Group 2 sources do not require controls or monitoring under 40 CFR 63 Subpart FFFF.
 - Emulsion Plant Lines (Equipment Group EM);
 - Liquids Product Lines (Equipment Group LQ); and
 - NMA/Mannich Plant (Equipment Group NMAN).
- Group 2 Storage Tanks – The following tanks are classified as Group 2 sources and are not required to be equipped with controls.
 - Acrylamide Tanks, Acrylic Acid Tanks, Benzyl Chloride Tank, Dimethyl Sulfate Tank, Ethylene Glycol Tanks, and Formaldehyde Tanks.
- Leak Detection and Repair – The facility has elected to comply with 40 CFR 63 Subpart UU as allowed by 40 CFR 63 Subpart FFFF for equipment leaks.
- Group 2 Process Wastewater and Maintenance Wastewater – The operations produce wastewater. The facility is required to comply with a number of record keeping requirements and is not required to install controls.
- Cooling Tower System – The subpart requires the facility to monitor the system for leaks and to maintain a number of records.

D. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

E. Operational Flexibility

None applicable.

F. Permit Conditions

The following table lists the conditions that appear in Part 3.0 of the renewal permit. Many conditions have been carried over from the previous permit/amendments and some conditions have been added. Citations and the formatting of conditions have been updated as needed. Information concerning conditions from the initial permit is discussed in the narrative for Air Quality Permit No. 2899-179-0011-V-01-0.

Renewal Condition	Original Condition		Notes
	Number	Permit	
3.2.1 3.2.2	3.2.2 3.2.3	Initial Amend. 7	The conditions were modified in the seventh amendment to reflect new limits for the modified Powder Plant Lines 5, 6, and 7.
3.2.3 3.2.4	3.2.8 3.2.9	Amend. 3	The conditions were added in the third amendment for the construction and operation of new Powder Plant Lines 10 and 11.
3.2.5	3.2.5	Initial Amend. 7	The condition was modified in the seventh amendment to reflect re-calculated limits for a group of emulsion plant lines.
3.2.6	3.2.6	Initial Amend. 2 Amend. 7	The condition was modified in the second amendment to reflect a change in the modeled emission rate for a group of emulsion plant lines. The condition was then modified in the seventh amendment to reflect re-calculated limits.
3.2.7	3.2.15	Amend. 7	The condition was added in the seventh amendment to include toxic impact limits for the group of emulsion plant lines that exhaust to scrubber SE3A/3B.
3.2.8	3.2.7	Amend. 2 Amend. 7	The condition was added in the second amendment to include a toxic impact limit for the installation and operation of the Dispersant Product Lines. The condition was then modified in the seventh amendment to reflect the repermitting of the Dispersant Product Lines and several emulsion plant lines as the Liquid Product Lines, to include additional processing lines, and to include re-calculated toxic impact limits.
3.2.9	3.2.11	Amend. 7	The condition was added in the seventh amendment to include a PSD avoidance limit for the production of IPA-dispersants in the Liquid Product Lines.
3.2.10 3.2.11	3.2.13 3.2.14	Amend. 7	The conditions were added in the seventh amendment to include PSD avoidance limits for the Liquid Product Lines.
3.3.12 3.2.13	3.2.10 3.2.12	Amend. 7	The conditions were added in the seventh amendment to include toxic impact limits and a PSD avoidance limit for the construction and operation of a new Liquids Product Line.
3.3.1	3.3.39	Initial	N/a
3.3.2	3.3.42	Initial Amend. 2	The condition was modified in the second amendment to include applicable tanks that were previously omitted. The condition has been generalized for the renewal to eliminate the need to list individual tank source codes.
3.3.3	3.3.40	Initial	N/a
3.3.4	3.3.41	Initial	N/a
3.3.5	--	--	The condition has been added to the renewal to direct the Permittee to the general section for 40 CFR 63 Subpart H.
3.3.6	3.3.16 3.3.17	Initial	N/a
3.3.7	3.3.7 3.3.8	Initial	N/a
3.3.8	3.3.10	Initial	N/a
3.3.9	3.3.11	Initial	N/a
3.3.10	3.3.14	Initial	N/a
3.3.11	3.3.12	Initial	N/a
3.3.12	3.3.13	Initial	N/a
3.3.13	--	--	The condition was added to the renewal permit for completeness purposes.
3.3.14	3.3.9	Initial	N/a
3.3.15 3.3.16	3.3.45 3.3.46	Amend. 6	The conditions were added in the sixth amendment for the construction and operation of a thermal oxidizer for compliance with 40 CFR 63 Subpart FFFF.
3.3.17 3.3.18	--	--	The conditions have been added to the renewal to include applicable provisions of 40 CFR 63 Subpart FFFF.
3.3.19	3.3.6	Initial	The condition has been updated for the renewal to include reference to 40 CFR 63 Subpart FFFF.
3.3.20 through 3.3.22	--	--	The conditions have been added to the renewal to include applicable provisions of 40 CFR 63 Subpart FFFF.

Renewal Condition	Original Condition		Notes
	Number	Permit	
3.3.23 3.3.24	3.3.48 3.3.47	Amend. 6	The conditions were added in the sixth amendment for the construction and operation of a thermal oxidizer for compliance with 40 CFR 63 Subpart FFFF. The conditions have been modified for the renewal to include reference to the Chemtall Plant.
3.3.25 through 3.3.28	--	--	The conditions have been added to the renewal to include applicable provisions of 40 CFR 63 Subpart FFFF.
3.3.29 3.3.30	3.3.20 3.3.21	Initial	N/a
3.3.31	3.3.22 through 3.3.24	Initial	The conditions have been modified for the renewal to add language and expanded existing language as listed in the subpart.
3.3.32 through 3.3.40	3.3.27 through 3.3.38	Initial	The conditions have been modified for the renewal as necessary to include all applicable language as listed in the subpart.
3.3.41 through 3.3.54	--	--	The conditions have been added to the renewal permit to include expanded language for 40 CFR 63 Subpart UU, which applies to the Flocryl Acrylates Continuous Plant, Flocryl Acrylates Batch Plant, and the Chemtall Plant.
3.3.55	3.3.2	Initial Amend. 8	The condition was modified in the eighth amendment for the installation and operation of Boilers B12C and B13C and to permit the combustion of methanol in all of the Flocryl Boilers.
3.3.56	3.3.4	Initial	N/a
3.3.57	3.3.5	Initial	A condition was added to the permit in the second amendment to include an applicability statement for 40 CFR 63 Subpart A through 40 CFR 63 Subpart FFFF. The conditions have been generalized for the renewal.
	3.3.44	Amend. 2	
3.3.58 through 3.3.60	3.3.15	Initial	N/a
3.3.61 3.3.62	3.3.7 3.3.8	Initial	N/a
3.3.63 3.3.64	--	--	The conditions have been added to the renewal for completeness purposes.
3.3.65	3.3.43	Amend. 2	The condition was added to the permit in the second amendment to include a general applicability statement for 40 CFR 63 Subpart FFFF. The condition has been modified for the renewal to remove reference to the compliance date, which has passed for the referenced sources.
3.3.66	3.3.1	Initial	N/a
3.3.67	3.3.6	Initial	N/a
3.4.1 3.4.2	3.4.1 3.4.2	Initial	N/a
3.4.3	3.4.7 3.4.12	Initial Initial	A condition was added to the permit in the second amendment to list Georgia Rules (b) and (c) for the Liquids Product Lines. The condition was modified in the seventh amendment to include reference to the Drum Dryer equipment. The conditions that referenced Georgia Rule (b) have been condensed into a single, generalized condition for the renewal.
	3.4.14	Amend. 2 Amend. 7	
3.4.4	3.4.8 3.4.11	Initial Initial	A condition was added to the permit in the second amendment to list Georgia Rules (b) and (c) for the Liquids Product Lines. The condition was modified in the seventh amendment to include reference to the Drum Dryer equipment. The conditions that referenced Georgia Rule (c) have been condensed into a single, generalized condition.
	3.4.13	Amend. 2 Amend. 7	
3.4.5	3.4.5	Initial	N/a
3.4.6	3.4.4	Initial	N/a
3.5.1	3.4.10	Initial Amend. 7	The condition was modified in the seventh amendment to reflect a change in the type of fittings installed on methyl chloride transport vehicles.

Renewal Condition	Original Condition		Notes
	Number	Permit	
--	3.2.1	Initial	The initial TV permit contained toxic impact limits for emissions from the Chloromethylation Plant incinerator/scrubber systems. The limits were necessary because there were no specific rules or regulations for the process when it was first permitted. The process, however, is now subject to the provisions of 40 CFR 63 Subpart FFFF. In July 2005, the facility conducted a worse-case performance test for the process. The test indicated that emissions were below the limits that were originally established. 40 CFR 63 Subpart FFFF also contains extensive requirements regarding monitoring and record keeping for the control devices. Therefore, the toxic impact limits that were originally set for the process have not been included in the renewal permit. The provisions of 40 CFR 63 Subpart FFFF are more than adequate to ensure that emissions are properly controlled. The test results were included in the most recent facility-wide toxic impact assessment.
--	3.2.4	Initial Amend. 7	The condition was deleted in the seventh amendment. The equipment was modeled at the rate recorded during performance testing and does not have control equipment for non-particulate emissions; therefore, the limit was no longer necessary.
--	3.3.3	Initial Amend. 2	The condition was deleted in the second amendment as a result of an amendment to 40 CFR 60 Subpart Kb by the U.S. EPA. The facility no longer operates tanks that are only subject to Subpart Kb.
--	3.3.18	Initial	The condition has not been included in the renewal permit. Although applicable, these provisions are not commonly included in permits. Also, SSM provisions are incorporated by reference by renewal Condition 3.3.6.
--	3.3.19	Initial	The condition has not been included in the renewal permit. These provisions are already incorporated by reference to reports in Part 6.2 of the permit.
--	3.3.25	Initial	The condition has not been included in the renewal permit. Although applicable, these provisions are incorporated by reference to the general applicability statement for 40 CFR 63 Subpart F.
--	3.3.26	Initial	The condition has not been included in the renewal permit. These provisions are already incorporated by reference to the general provisions of 40 CFR 63 Subpart A.
--	3.4.3	Initial	The condition has not been included in the renewal permit. The boilers at SNF burn fuel that contains negligible amounts of sulfur or no sulfur at all. The condition is subsumed by renewal Condition 3.3.56.
--	3.4.6 3.4.9	Initial	The conditions have not been included in the renewal permit. The Chloromethylation process is now subject to 40 CFR 63 Subpart FFFF, which contains extensive requirements for control devices and closed vent systems. It is not necessary to include separate conditions for these requirements. Also, it is not necessary to specify natural gas for the incinerators. The use of natural gas is standard in these devices.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

1. Individual Equipment

The following table lists the conditions that appear in Part 4.0 of the renewal permit. Many conditions have been carried over from the previous permit/amendments and some conditions have been added. Citations and the formatting of conditions have been updated as needed. Information concerning conditions from the initial permit is discussed in the narrative for Air Quality Permit No. 2899-179-0011-V-01-0.

Renewal Condition	Original Condition		Notes
	Number	Permit	
4.2.1	4.2.19	Amend. 6	The condition was added in the sixth amendment to include testing provisions under 40 CFR 63 Subpart FFFF for the installation and operation of a thermal oxidizer at the Floccryl Acrylates Batch Plant.
4.2.2	--	--	The condition has been added to the renewal to include testing provisions for the existing Chloromethylation Plant Incinerator/Scrubber systems under the provisions of 40 CFR 63 Subpart FFFF.
4.2.3 through 4.2.5	4.2.16 through 4.2.18	Amend. 7	The conditions were added in the seventh amendment to include testing provisions for Powder Plant Lines 5, 6, and 7 after permitted production increases.
4.2.6	4.2.11	Amend. 3	The condition was added in the third amendment to include testing provisions for the installation and operation of Powder Plant Line 11.
4.2.7 4.2.8	4.2.14 4.2.15	Amend. 7	The conditions were added in the seventh amendment to include testing for several Emulsion Plant Lines in order to collect emission data to demonstrate compliance with the recalculated toxic impact limits.
4.2.9	4.2.1	Initial Amend. 7	The condition was modified in the seventh amendment to include testing provisions for several Emulsion Plant Lines that were being routed to a new scrubber.
4.2.10	4.2.9	Amend. 2 Amend. 7	The condition was added in the second amendment to include testing provisions for the construction and operation of the new Dispersant Product Lines. The condition was then modified in the seventh amendment when the Dispersant Product Lines were redesignated as Liquids Product Lines and routed to a new scrubber.
4.2.11	4.2.13	Amend. 7	The condition was added in the seventh amendment to include testing provisions for sulfur dioxide from the Liquids Product Lines, which were being routed to a new scrubber.
4.2.12	4.2.12	Amend. 7	The condition was added in the seventh amendment to include testing provisions for the installation and operation of the new Liquids Product Line 13.
4.2.13 4.2.14	--	--	The conditions have been added to the renewal for completeness purposes for 40 CFR 63 Subparts SS and FFFF as they apply to the Chemtall Plant and Floccryl Acrylates Batch Plant.
4.2.15	4.2.4 through 4.2.6	Initial	N/a
4.2.16	--	--	The condition has been added to the renewal for completeness purposes for 40 CFR 63 Subpart UU as it applies to the Chemtall Plant, the Floccryl Acrylates Batch Plant, and the Floccryl Acrylates Continuous Plant.
--	4.2.2	Initial	The condition has not been included in the renewal because the testing has already been conducted.
--	4.2.7	Amend. 1	The Condition was added in the first amendment to require the facility to conduct performance testing following the reconstruction of Powder Plant Line 3. The testing has been conducted; therefore, the condition has not been included in the renewal.
--	4.2.8	Amend. 2 Amend. 7	The condition was added in the second amendment to include testing related to the installation and operation of Emulsion Plant Line 31. The condition was deleted in the seventh amendment because the testing provisions were subsumed with new testing requirements.

Renewal Condition	Original Condition		Notes
	Number	Permit	
--	4.2.10	Amend. 3	The condition was added in the third amendment to include testing provisions for the installation and operation of Powder Plant Line 10. The testing has been completed; therefore, the condition is no longer necessary.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Individual Equipment:

The following table lists the conditions that appear in Part 5.0 of the renewal permit. Many conditions have been carried over from the previous permit/amendments and some conditions have been added. Citations and the formatting of conditions have been updated as needed. Information concerning conditions from the initial permit is discussed in the narrative for Air Quality Permit No. 2899-179-0011-V-01-0.

Renewal Condition	Original Condition		Notes
	Number	Permit	
5.2.1.a	5.2.1.a	Initial	N/a
5.2.1.b	5.2.12	Initial	The condition has been modified for the renewal to incorporate the monitoring plan the facility developed for Condenser C520.
5.2.1.c	5.2.1.b	Initial	N/a
5.2.1.d	5.2.14.a	Amend. 6	The condition was added in the sixth amendment to include monitoring requirements for the thermal oxidizer installed at the Flocryl Acrylates Batch Plant for the purposes of compliance with 40 CFR 63 Subpart FFFF. The condition has been modified slightly for the renewal to include more specific language.
5.2.1.e	5.2.2.b	Initial	The condition has been modified for the renewal to include 40 CFR 63 Subpart FFFF language as it applies to the Chloromethylation Plant Incinerator/Scrubber systems.
5.2.1.f	5.2.2.c	Initial Amend. 3	The condition was modified in the third amendment to remove pressure drop and scrubbant flow rate monitoring and replace it with temperature monitoring for the venturi section of each Chloromethylation Plant scrubber. The change was necessary because the section was mistakenly classified as a scrubbing section. It is actually an adiabatic quench section designed to reduce the temperature of the gases exiting the incinerator. The condition has been modified for the renewal to include provisions of 40 CFR 63 Subpart FFFF. The temperature monitoring requirement has been moved to a separate condition as it is not a parameter that is specified in 40 CFR 63 Subpart FFFF.
5.2.2.a 5.2.2.b	5.2.2.j 5.2.2.k	Initial	N/a
5.2.2.c	5.2.2.c	Initial Amend. 3	Please see the notes for renewal Condition 5.2.1.f.

Renewal Condition	Original Condition		Notes
	Number	Permit	
5.2.2.d	5.2.2.g	Initial Amend. 3 Amend. 7	The condition was modified in the third amendment to include monitoring for the baghouses associated with new Powder Plant Lines 10 and 11. The condition was then modified in the seventh amendment to include monitoring for the baghouses associated with the Drum Drying Processes. The condition has been modified for the renewal to simplify the control equipment references.
5.2.2.e	5.2.2.l	Amend. 2 Amend. 7	The condition was added in the second amendment to include monitoring for new Scrubber SE3A/3B. The condition was then modified in the seventh amendment to include monitoring for new scrubber CE4A/4B.
5.2.2.f	5.2.2.i	Initial Amend. 3	The condition pertaining to Scrubbers SC1 and SG2 was modified in the third amendment to allow the facility to monitor the devices once per shift rather than once per batch. A condition pertaining to Scrubbers CE5, CE6, and CE7 was added in the seventh amendment to include monitoring for the devices. Scrubbers CE6 and CE7 were new scrubbers and CE5 was an existing scrubber that had been installed through an off-permit approval. The conditions have been combined for the renewal.
	5.2.2.m	Amend. 7	
5.2.2.g	5.2.2.f	Initial	N/a
5.2.2.h	5.2.2.a	Initial	The condition has been simplified for the renewal.
5.2.3	5.2.8	Initial	N/a
5.2.4	--	--	The conditions have been added to the renewal to include standard monitoring practices for the baghouses at the SNF site.
5.2.5	5.2.5	Initial Amend. 7	The condition was modified in the seventh amendment to remove language that referenced the submission of an initial preventative maintenance plan. The condition has been generalized for the renewal.
5.2.6 5.2.7	--	--	The conditions have been added to the renewal to include the CAM requirements for various control devices at the SNF site.
5.2.8	5.2.4	Initial Amend. 7	The condition was modified in the seventh amendment to reflect a change in the type of fittings installed on methyl chloride transport vehicles.
5.2.9	--	--	The condition has been added to the renewal to include a flow indicator requirement for control devices subject to the provisions of 40 CFR 63 Subpart FFFF.
5.2.10	--	--	The condition has been added to the renewal to include cooling tower water system monitoring requirements for units subject to the provisions of 40 CFR 63 Subpart FFFF.
5.2.11	5.2.3	Initial Amend. 2 Amend. 8	The condition was modified in the second amendment to reflect a change in the test method. The U.S. EPA replaced test method 8240 with 8260. The condition was modified in the eighth amendment to reflect the permitting of methanol as fuel in all of the Flocryl Boilers.
--	5.2.2.d	Initial	It is not necessary to specify natural gas for the incinerators; therefore, the condition has not been included in the renewal.
--	5.2.2.e	Initial Amend. 2	The condition was deleted in the second amendment when scrubber CES3 was replaced with scrubber SE3AB.
--	5.2.2.h	Initial Amend. 7	The condition was deleted in the seventh amendment. The facility has withdrawn plans to construct the process known as the Bead Plant.
--	5.2.6 5.3.6	Initial	The conditions have not been included in the renewal permit. The Flocryl Acrylates Batch Plant is now subject to LDAR provisions under 40 CFR 63 Subpart FFFF. It is not necessary to include separate requirements.
--	5.2.7	Initial Amend. 7	The condition was deleted in the seventh amendment. The carbon beds were removed when the facility modified the process to eliminate the need for the beds.
--	5.2.9	Initial	The condition has not been included in the renewal permit. The LDAR program was submitted in 2004.
--	5.2.10 5.2.11	Initial	The conditions have not been included in the renewal permit. The monitoring plan and notification of compliance status reports referenced in the conditions have been submitted.

Renewal Condition	Original Condition		Notes
	Number	Permit	
--	5.2.13	Initial	The condition has not been included in the renewal permit. The LDAR requirements are described completely in Section 3.3.
--	5.3.1	Initial	The condition has not been included in the renewal permit because Section 5.3 no longer appears as part of the Georgia Part 70 permit template. All reporting and record keeping requirements are covered in Part 6.0 of the permit.
--	5.3.3	Initial	The condition has not been included in the renewal permit because the record keeping is covered by the provisions of new Condition 5.2.5.
--	5.3.4	Initial Amend. 7	The condition was deleted in the seventh amendment. The facility has implemented process changes that make the control units unnecessary.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

C. Compliance Assurance Monitoring (CAM)

The facility operates several units that are considered *pollutant specific emission units* (PSEUs) per Part 64 because they are (1) subject to a pollutant emission standard for which there is a control device, and (2) the pre-controlled potential emissions for the pollutant is greater than the major source threshold. The frequency of data collection under Part 64 depends on whether the controlled potential to emit exceeds the major source threshold (i.e., whether the PSEU is a large PSEU). A large PSEU required continuous monitoring while a PSEU that is not classified as large requires monitoring at least once per 24-hour period.

Emission Unit(s)	Control Device(s)	Pollutant	Potential Emissions (tpy)		Large PSEU(s) ?
			Uncontrolled	Controlled	
Power Plant Lines 1-4	Baghouses	PM	>100	3.33	No
Power Plant Lines 5-7	Baghouses	PM	>100	2.85	No
Power Plant Line 8	Baghouses	PM	>100	4.34	No
Power Plant Line 9	Baghouses	PM	>100	4.72	No
Power Plant Lines 10 and 11	Baghouses	PM	>100	6.22	No

*The controlled emissions are based on construction applications submitted by the facility. The baghouses have minimum control efficiencies of 99%.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

The following table lists the conditions that appear in Part 6.0 of the renewal permit. Many conditions have been carried over from the previous permit/amendments and some conditions have been added. Citations and the formatting of conditions have been updated as needed. Information concerning conditions from the initial permit is discussed in the narrative for Air Quality Permit No. 2899-179-0011-V-01-0.

Renewal Condition	Original Condition		Notes
	Number	Permit	
6.1.7.b(i)	6.1.7.b(vi)	Initial	N/a
6.1.7.b(ii)	6.1.7.b(vii)	Initial	N/a
6.1.7.b(iii) through 6.1.7.b(v)	6.1.7.b(xiii) through 6.1.7.b(xv)	Amend. 7	The conditions were added in the seventh amendment to include exceedance provisions for recalculated toxic impact limits for several Emulsion Plant Lines.
6.1.7.b(vi) through 6.1.7.b(viii)	6.1.7.b(viii) through 6.1.7.b(xi)	Amend. 7	The conditions were added in the seventh amendment to include exceedance provisions for recalculated toxic impact limits and PSD Avoidance limits for Liquids Product Lines 1 through 12.
6.1.7.b(ix) through 6.1.7.b(x)	6.1.7.b(xii) through 6.1.7.b(xix)	Amend. 7	The conditions were added in the seventh amendment to include exceedance provisions for toxic impact limits and PSD Avoidance limits for the installation and operation of Liquids Product Line 13.
6.1.7.b(xi)	6.1.7.b(i)	Initial	The conditions were modified in the eighth amendment to reflect the combustion of methanol as fuel in all of the Flocryl Boilers.
	6.1.7.b(ii)	Amend. 8	
6.1.7.b(xii)	6.1.7.b(xvi)	Amend. 8	The condition was added to the permit in the eighth amendment to reflect the installation and operation of Boilers B12C and B13C.
	6.1.7.b(xvii)	Amend. 8	
6.1.7.b(xiii)	6.1.7.b(xiii)	Initial	The condition was modified in the eighth amendment to reflect the combustion of methanol as fuel in all of the Flocryl Boilers.
6.1.7.c(i)	6.1.7.c(xi)	Initial	N/a
6.1.7.c(ii)	6.1.7.c(xii)	Initial	N/a
6.1.7.c(iii)	6.1.7.c(x)	Initial	The condition has been modified for the renewal to include the specific parameter the facility has identified for demonstrating proper operation of the Crude Ester Tank Condenser.
6.1.7.c(iv)	6.1.7.c(ix)	Initial	N/a
6.1.7.c(v)	6.1.8.a(i)	Amend. 6	The condition was added in the sixth amendment to include an excursion condition for the operation of the Flocryl Acrylates Batch Plant Thermal Oxidizer under the provisions of 40 CFR 63 Subpart FFFF.
6.1.7.c(vi)	6.1.7.c(ii)	Initial	The condition has been modified for the renewal to include the excursion language required under 40 CFR 63 Subpart FFFFF as it applies to the Chloromethylation Plant control equipment.
6.1.7.c(vii)	6.1.7.c(i)	Initial Amend. 3	The condition was modified in the third amendment to remove pressure drop and scrubbing flow rate excursions and replace it with temperature excursions for the venturi section of each Chloromethylation Plant scrubber. It was also modified to update the pH range for excursions on the packed bed sections. The condition has been modified for the renewal to include provisions of 40 CFR 63 Subpart FFFF. The temperature excursion reporting requirement has been moved to a separate condition as it is not a parameter that is specified in 40 CFR 63 Subpart FFFF.
6.1.7.v(viii)	6.1.7.c(i)	Initial Amend. 3	Please see notes for renewal condition 6.1.7.c(vii).
6.1.7.c(ix)	6.1.7.c(iii)	Initial Amend. 3 Amend. 7	The condition was modified in the third amendment to include monitoring for the baghouses associated with new Powder Plant Lines 10 and 11. The condition was then modified in the seventh amendment to include monitoring for the baghouses associated with the Drum Drying Processes. The condition has been modified for the renewal to simplify the control equipment references.
6.1.7.c(x)	6.1.7.c(iv)	Initial	N/a
6.1.7.c(xi)	--	--	The condition has been added to the renewal to include excursion provisions for visible emissions checks for baghouses at the SNF site.
6.1.7.c(xii)	--	--	The condition has been added to the renewal to include excursion provisions for CAM requirements for baghouses at the SNF site.

Renewal Condition	Original Condition		Notes
	Number	Permit	
6.1.7.c(xiii)	6.1.7.c(xiii)	Amend. 2 Amend. 7	The condition was added to in the second amendment to include excursion provisions for new scrubber SE3A/3B. The condition was modified in the seventh amendment to update the pH excursion ranges.
	6.1.7.c(xiv)	Amend. 7	The condition was added in the seventh amendment to include excursion provisions for new scrubber CE4A/4B.
6.1.7.c(xiv)	6.1.7.c(xv)	Amend. 7	The condition was added in the seventh amendment to include excursion provisions for scrubber CE5, which was previously installed under an off-permit change approval.
6.1.7.c(xv) 6.1.7.c(xvi)	6.1.7.c(xvi) 6.1.7.c(xvii)	Amend. 7	The conditions were added in the seventh amendment to include excursion provisions for new scrubbers CE6 and CE7.
6.1.7.c(xvii)	6.1.7.c(vii)	Initial	N/a
6.1.7.c(xviii)	6.1.7.c(v)	Initial Amend. 2	The condition was modified in the second amendment to remove reference to scrubber CES3 when the unit was replaced with scrubber SE3A/B.
6.1.7.d(i)	6.1.7.d(iv)	Initial	N/a
6.1.7.d(ii) through 6.1.7.d(iv)	6.1.7.d(ix) through 6.1.7.d(xi)	Amend. 7	The conditions were added in the seventh amendment to include reporting for 12-month emission total limits and production limits for the Liquids Product Lines and some Emulsion Plant Lines.
6.1.7.d(v)	6.1.7.d(i)	Initial	N/a
6.2.1	--	--	The provisions of 40 CFR 63.103(c)(1) have been added to the permit for completeness purposes.
6.2.2	6.2.14	Initial	N/a
6.2.3	6.2.15 through 6.2.18	Initial	The conditions have been consolidated for the renewal.
6.2.4	6.2.6	Initial Amend. 2	The condition was modified in the second amendment to include applicable tanks that were previously omitted. The condition has been generalized for the renewal to eliminate the need to list individual tank source codes.
6.2.5	6.2.19	Initial	N/a
6.2.6	6.1.7.d(v) through 6.1.7.d(viii)	Initial	The conditions have been consolidated for the renewal and reference to reports in 40 CFR 63.151(a) and 63.152(a) has been added for completeness purposes.
6.2.7	6.2.9 6.1.7.d(iii)	Initial	Conditions from the initial permit have been consolidated for the renewal. Additional language from 40 CFR 60.665 has been added to the permit for completeness purposes.
6.2.8	4.2.3	Initial	The condition has been moved to the appropriate section of the permit.
6.2.9	--	--	The condition has been added to the renewal for completeness purposes.
6.2.10	6.2.10	Initial	N/a
6.2.11	6.2.11	Initial	N/a
6.2.12	6.2.6	Initial Amend. 2	The condition was modified in the second amendment to include applicable tanks that were previously omitted. The condition has been generalized for the renewal to eliminate the need to list individual tank source codes.
6.2.13	5.3.5	Initial	N/a
6.2.14 6.2.15	6.2.31 6.2.32	Amend. 7	The conditions were added in the seventh amendment to include record keeping and reporting necessary to demonstrate compliance with the recalculated toxic impact limits in terms of pounds per 12-month period for several Emulsion Plant Lines.
6.2.16 6.2.17	6.2.26 6.2.27	Amend. 7	The conditions were added in the seventh amendment to include record keeping and reporting necessary to demonstrate compliance with the PSD avoidance limits for production and emissions from the Liquids Products Lines.
6.2.18	6.2.28	Amend. 7	The condition was added in the seventh amendment to require the facility to keep production records necessary to demonstrate compliance with limits and production constraints for the Liquids Product Lines.
6.2.19	6.2.29	Amend. 7	The condition was added to the permit in the seventh amendment to require the calculations and record keeping necessary to comply with pound per year toxics limits established for the Liquids Product Lines.
6.2.20	5.3.2	Initial Amend. 7	The condition was modified in the seventh amendment to reflect a change in the type of fittings installed on methyl chloride transport vehicles.

Renewal Condition	Original Condition		Notes
	Number	Permit	
6.2.21	6.2.30	Amend. 7	The condition was added in the seventh amendment to require written notification for the construction and startup of new equipment. The powder plants have been started up; therefore, reference to the lines has not been included in the renewal.
6.2.22	--	--	The condition has been added to the renewal to include applicable provisions of 40 CFR 63 Subpart FFFF for the Flocryl Acrylates Batch Plant and the Chemtall Plant.
6.2.23 through 6.2.25	6.2.34 6.2.36 6.2.37	Amend. 6	The conditions were added in the sixth amendment to include provisions of 40 CFR 63 Subpart FFFF for the installation and operation of a thermal oxidizer for the Flocryl Acrylates Batch Plant. The conditions have been modified for the renewal to include reference to the Chemtall Plant. The conditions have been expanded to include additional language as needed.
6.2.26	6.2.12	Initial	The condition has been modified for the renewal to include reference to the Flocryl Acrylates Batch Plant and Chemtall Plant, which are subject to the provisions of 40 CFR 63 Subpart FFFF.
6.2.27	6.2.13	Initial	The condition has been modified for the renewal to include reference to the Flocryl Acrylates Batch Plant and Chemtall Plant, which are subject to the provisions of 40 CFR 63 Subpart FFFF. The conditions have been consolidated for the renewal.
	6.2.20		
6.2.28 through 6.2.33	--	--	The condition has been added to the renewal to include applicable provisions of 40 CFR 63 Subparts SS and FFFF for the Flocryl Acrylates Batch Plant and the Chemtall Plant.
6.2.34 through 6.2.37	5.3.7 through 5.3.10	Initial	N/a
6.2.38	5.3.11 5.3.12	Initial	N/a
6.2.39	--	--	The condition has been added to the renewal for completeness purposes. It appears that it was inadvertently left out of the initial permit.
6.2.40	5.3.13	Initial	N/a
6.2.41	5.3.14	Initial	N/a
6.2.42 through 6.2.46	--	--	The conditions have been added to the renewal for completeness purposes. There are existing components that are subject to LDAR through 40 CFR 63 Subpart UU and the Chemtall Plant and Flocryl Acrylates Batch Plant will comply with the subpart as required by 40 CFR 63 Subpart FFFF.
6.2.47	6.2.3	Initial Amend. 3 Amend. 8	The condition was modified in the third amendment to allow the facility to maintain fuel usage records on a monthly basis rather than a daily basis. This was based on several determinations issued by the U.S. EPA. The condition was modified in the eighth amendment for the installation and operation of two new boilers and for the combustion of methanol in all of the Flocryl Boilers. The condition has been modified for the renewal to include record keeping language from 40 CFR 60 Subpart Dc, which was recently amended to allow further flexibility in maintaining fuel usage records, and to streamline the condition.
6.2.48 6.2.49	6.2.34 6.2.35	Amend. 8	The conditions were added to the permit in the eighth amendment for the installation and operation of Boilers B12C and B13C.
6.2.50	6.2.4	Initial	
--	6.1.7.c(iv)	Initial	The condition has not been included in the renewal permit. It is not necessary to specify natural gas for the incinerators.
--	6.1.7.b(v)	Initial	The conditions have not been included in the renewal permit. The Chloromethylation process is now subject to 40 CFR 63 Subpart FFFF, which contains extensive requirements for control devices and closed vent systems. It is not necessary to include separate conditions for these requirements.
--	6.1.7.c(vi)	Initial Amend. 7	The condition was deleted in the seventh amendment. The facility has withdrawn plans to construct the process known as the Bead Plant.
--	6.1.7.c(viii)	Initial Amend. 7	The condition was deleted in the seventh amendment. The facility has implemented process changes that make the control units unnecessary.
--	6.1.7.d(ii)	Initial Amend. 3	The condition was deleted in the third amendment. Due to the number of baghouses at the site, such requirements could create large amounts of paperwork that are burdensome to the facility and the Division. The facility maintains records at the plant, which are available for review upon request.

Renewal Condition	Original Condition		Notes
	Number	Permit	
--	6.2.1 6.2.2	Initial	The conditions have not been included in the renewal permit. The renewal application indicates that the referenced boilers have been constructed.
--	6.2.5	Initial Amend. 2	The condition was deleted in the second amendment as a result of an amendment to 40 CFR 60 Subpart Kb by the U.S. EPA. The facility no longer operates tanks that are only subject to Subpart Kb.
--	6.2.7	Initial Amend. 7	Condition 6.2.7 was modified in the seventh amendment to include reference to the Liquids Product Lines. The requirements in Condition 6.2.7 and 6.2.8 date back to when the Chemtall and Flocryl sites were permitted as separate minor sites and the respective permits contained synthetic minor limits. Those limits no longer apply; therefore, there is no regulatory basis for the conditions. They have not been included in the renewal permit.
--	6.2.8	Initial	
--	6.2.21 through 6.2.24	Initial	The conditions have not been included in the renewal permit. The language is applicable; however, it is not likely the facility will make frequent changes to the Bio-Flocryl Plant. It is not necessary to include the language in the permit. The facility and the EPD will review all applicable regulations associated with any process changes during the permitting process.
--	6.2.25	Amend. 3	The condition was added in the third amendment to require written notification for the construction and startup of reconstructed equipment. The project has been completed; therefore, the requirements is not necessary.
--	6.2.33	Amend. 7	The condition was added to the permit in the seventh amendment to require written notification for the removal of the Flocryl Acrylates Batch Plant inhibitor pot carbon beds. The condition has not been included in the renewal because the notification has been made.
--	6.2.35	Amend. 6	The condition was added to the permit in the sixth amendment to require the facility to submit a notification of compliance status report for 40 CFR 63 Subpart FFFF. This report has been submitted; therefore, the condition is no longer necessary.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Not Applicable.

The facility previously listed Shutdown Tank 208 as a short-term activity under Condition 7.6.1 of the initial permit. This tank is now a controlled source under the provisions of 40 CFR 63 Subpart FFFF and is included in the equipment list as process equipment at the Flocryl Acrylates Batch Plant. The source will no longer be listed as a short-term activity.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Not Applicable.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The 30 day public review started on May 22, 2009 and ended on June 22, 2009. Comments were received from the facility and from GreenLaw on the on behalf of the Ogeechee-Canoochee Riverkeeper.

Facility Comments**Comment 1**

Miscellaneous Pages: Other than Condition 1.2, please change all references to "Bio-Flocryl" to read "Flocryl Acrylamide".

EPD Response: The changes have been made as requested.

Comment 2

Page 1: Please fix the typographical error in Condition 1.3, first paragraph of the Chemtall Process Description to read "n-methylolacrylamide" instead of "n-methylacrylamide".

EPD Response: The typographical error has been corrected.

Comment 3

Page 1: Please change Condition 1.3, third paragraph of the Chemtall Process Description for the Chloromethylation Plant to read "There are five permitted batch lines..." instead of "There are currently five batch lines..."

EPD Response: The word "currently" has been removed for the sentence. It is not necessary to include the word "permitted".

Comment 4

Page 2: Please change the first paragraph of the description of the Powder Plants to read as indicated below (**in bold**) to account for additional raw materials used for some products.

The powder plants produce polyacrylamide powder flocculants. The major raw materials for the powders are acrylamide, acrylic acid, cationic monomers, sodium hydroxide, **ammonium hydroxide, potassium hydroxide,** and water. In addition to these major raw materials other chemicals are used in small quantities, either as catalysts, process aids, or product additives. The three main types of powder flocculants produced in the powder plant are: nonionic (uses acrylamide only), anionic (uses acrylamide, acrylic acid, and sodium hydroxide), and cationic (uses acrylamide and cationic monomer).

EPD Response: The change has been made as requested.

Comment 5

Page 2: Please change "ribbon blenders" to "blenders" in the third paragraph, sixth and eleventh lines of the Powder Plant description since not all blenders are ribbon blenders.

EPD Response: The changes have been made as requested.

Comments 6 through 8

Page 2: Please fix the typographical error in the first paragraph, second line for Liquids Product Lines to read "polymers" instead of "polmers".

Page 3: Please fix the typographical error in the first paragraph, third sentence for Mannich Polymer Production to read "Acrylamide is stored in storage tanks..." instead of "Acrylamide is stored in a storage tanks..."

Page 3: Please fix the typographical error in the first paragraph, line four for Mannich Polymer Production to read "tetramethylenediamine" instead of "tetremethylenediamine".

EPD Response: The typographical errors have been corrected.

Comment 9

Page 3: Please change the description of the Floeryl Acrylates Plant Batch Process to read as indicated below (**in bold**) to account for the thermal oxidizer controlling emissions on the batch lines.

The reaction step is a batch transesterification with a reactant ester (MA or MMA) reacting with an alcohol (DMOH) to produce the product ester (ADAM or MADAM) plus a co-product alcohol (methanol). To begin the batch process the raw materials are reacted and the product is pumped to a distillation step. The distillation step consists of a kettle reboiler, distillation column, and other associated equipment. The product is distilled into various fractions and the fractions are either returned for additional processing or sent to storage. **The vents from the batch reactors, product distillation, methanol recovery systems, methanol product storage tanks, and shutdown tanks, vent to the thermal oxidizer.** Small amounts of polymerization inhibitors are used in the process. The inhibitor solutions are made-up in small mix vessels. The facility includes two methanol recovery systems. The methanol stream from the reactor distillation is sent to one of two storage tanks and then is pumped to one of two batch reactor / distillation steps.

EPD Response: The change has been made as requested.

Comments 10 through 12

Page 4: Please fix the typographical error in the last line for the Floeryl Acrylamide Plant Catalyst Separation and Product Filtration to read "transferred" instead of "transferred".

Page 7: Please fix the typographical error in the description for R502 to read "transesterification" instead of "transesterification".

Page 7: For the FUGC Fugitive Emissions from Equipment Leaks for Floeryl Acrylates Continuous Plant, please change "FALN" to "FALH".

EPD Response: The typographical errors have been corrected.

Comment 13

Page 8: Please fix the typographical error for the Corresponding Permit Conditions for FUGB ID No. to read "3.3.41 through 3.3.54" instead of "3.3.41, through 3.3.54".

EPD Response: The numerical reference is correct. No changes have been made.

Comment 14

Page 8: Please change the Corresponding Permit Conditions for FUGB ID No. to read "6.2.42 through 6.2.46" instead of "6.2.42 through 6.2.26".

EPD Response: The references have been corrected.

Comment 15

Page 10: Please fix the typographical error for the NMAN – NMA/Mannich Plant RNMA description to read "NMA Reactor" instead of "RNMA Reactor".

EPD Response: The change has been made as requested.

Comments 16 and 17

Page 10: Under "other", please change "TCB1" to read "TBC1".

Page 10: Please fix the typographical error in the second to last row of the page to read "Maintenance Wastewater" instead of "Maintentance Wastewater".

EPD Response: The typographical errors have been corrected.

Comment 18

Page 10: Please add a row with the following information to the "Other" category for Chemtall to account for Hydrochloric Acid storage tanks HC01 and HC02 which are Group 2 storage tanks under the MON Rule:

ID No.: HC01, HC02

Description: Hydrochloric Acid Tanks

Applicable Requirements/Standards: 40 CFR 63 Subpart FFFF²

Corresponding Permit Conditions: 3.3.23, 3.3.57, 3.3.65, 4.2.13, and 6.2.23 through 6.2.25*

APC Device ID No.: None

APC Device Description: None

EPD Response: The EPD has verified that the tanks are Group 2 Sources under 40 CFR 63 Subpart FFFF because each tank has a capacity of 8,200 gallons, which is less than the 10,000 gallon threshold for Group 1 status. The tanks are not subject to 40 CFR 60 Subpart Kb because they do not contain organic liquid. The tanks have been added to the equipment list as requested.

Comment 19

Pages 11 through 13: Condition Nos. 3.2.1 through 3.2.8 and 3.2.12 set emission limits for toxic air pollutants which are based upon modeled emission rates used to demonstrate compliance with air toxic guidelines. While we attempt to provide representative emissions in regards to the modeled emissions rates, the rates modeled are annual averages and they may or may not agree with stack tests that are conducted over a limited time frame. Instead of having to submit permit modifications each time a permit limit based on air toxic guideline modeling is exceeded, we suggest including a permit condition stating that if permit limits based on air toxics modeling is exceeded, the source can alternatively demonstrate compliance with the air toxic guidelines through submittal of revised modeling for the source incorporating recent stack tests.

EPD Response: No changes have been made as a result of this comment. The EPD will continue to address these issues through the Compliance Program and with permit modifications where applicable.

Comment 20

Pages 11 through 13: For Condition 3.2.4, which lists permit limits for P11, recent stack testing does not demonstrate compliance with the emission limits for acrylic acid. A permit application requesting a change to the acrylamide limits will be submitted in the event that our suggested permit condition in Comment 19 is not included in the final permit.

EPD Response: Potential non-compliance issues are addressed first through the Stationary Source Compliance Program. No changes have been made as a result of this comment. Please see the response to Comment 19.

Comments 21 through 30

Page 15: Please delete repeated word "as" in Condition 3.3.18 to read "... (4) and (5) as follows:" instead of "... (4) and (5) as as follows:".

Page 16: Please fix the typographical error in Condition 3.3.20.a to read "closed vent system" instead of "closed vent sytem".

Page 16: Please add an extra space between "device;" and "or" in Condition 3.3.21.a to read "device; or" instead of "device;or".

Page 16: Please delete repeated word "as" in Condition 3.3.22 to read "... (4) and (5) as follows:" instead of "... (4) and (5) as as follows:".

Page 20: Please fix the typographical error in Condition 3.3.31.d to read "Condition 6.2.40" instead of "Condiiton 6.2.40".

Pages 21 and 27: Please fix the typographical errors in Conditions 3.3.31.f and 3.3.35.l to read "Permittee" instead of "Permitee".

Page 26: Please fix the typographical error in Condition 3.3.35.f.i to read "...according to paragraphs (g) through (j)..." instead of "...according to paragraphs (g) and (j)...".

Page 28: Please change Condition 3.3.35.n to read "...Condition 6.2.35.i(i)..." instead of "...Condition 6.2.35.a(i)...".

Page 29: Please change Condition 3.3.36.a to read "...paragraphs (c) through (e)..." instead of ".....paragraphs (b) through (e).....".

Page 31: Please fix the typographical error in Condition 3.3.37.d to read "...equation in 40 CFR 63.174(i)(2)..." instead of "...equation in 40 CFR 3.174(i)(2)...".

EPD Response: The corrections have been made as requested.

Comment 31

Page 31: Please fix the typographical error in Condition 3.3.37.f.iv to read "...subpart of 40 CFR 63 that references..." instead of "...subpart of 40 CFR 63 part 63 that references ...".

EPD Response: The typographical error has been corrected.

Comment 32

Page 36: Please fix the typographical error in Condition 3.3.42.c.i to read "but are not" instead of "but is not".

EPD Response: The language is found in the regulations. No changes have been made as a result of this comment.

Comment 33

Page 36: Please change Condition 3.3.42.c.i to read "...pumps meeting the provisions of Condition 3.3.47.d(iv)..." instead of "...pumps meeting the provisions of Condition 3.3.47.iv...".

EPD Response: The reference has been corrected.

Comments 34 through 36

Page 38: Please fix the typographical error in Condition 3.3.43.b to read "Permittee" instead of "Permitte".

Page 39: Please fix the typographical error in Condition 3.3.45.c to read "Permittee" instead of "Permitte".

Page 41: Please fix the typographical error in Condition 3.3.46.a to read "paragraph" instead of "pargraph".

EPD Response: The typographical errors have been corrected.

Comment 37

Page 42: Please change Condition 3.3.46.a.iii(B) to read "...either Condition 4.2.16.a(i) through (v), or..." instead of "...either Condition 4.2.16.a(i) through (iv), or ...".

EPD Response: The reference has been corrected.

Comment 38

Page 46: Please change Condition 3.3.47.a.i to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b" instead of "...Condition 4.2.16".

EPD Response: The change has been made as requested.

Comment 39

Pages 46 and 49: Please fix the typographical errors in Conditions 3.3.47 and 3.3.48 to read "Permittee" instead of "Permitte".

EPD Response: The typographical errors have been corrected.

Comment 40

Page 47: Please change Condition 3.3.47.c to read "...detected pursuant to paragraph (a) of this condition...specified in paragraph (a)(iv) of this condition..." instead of "...detected pursuant to paragraph (c) of this condition...specified in paragraph (b)(4) of this condition...".

EPD Response: The references have been corrected.

Comments 41 and 42

Page 48: Please change Condition 3.3.47.d.i(E)(I) to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b" instead of "...Condition 4.2.16".

Page 49: Please change Condition 3.3.48.b.i to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b" instead of "...Condition 4.2.16".

EPD Response: The changes has been made as requested.

Comments 43 and 44

Page 49: Please change Condition 3.3.48.b.iii to read "...percent leaking connectors shall be calculated as specified in paragraph (c) of this condition" instead of "...percent leaking connectors shall be calculated as specified in paragraph (a) of this condition".

Page 51: Please change Condition 3.3.48.e.ii(A) to read "...provisions specified in 40 CFR 63.1027(e)(2)(i)(A) through (F)..." instead of "...provisions specified 40 CFR 63.1027(e)(2)(A) through (F)...".

EPD Response: The references have been corrected.

Comments 45 and 46

Page 51: Please change Condition 3.3.49.a.iii(B)(I) to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b to determine..." instead of "...Condition 4.2.16 to determine...".

Page 52: Please change Condition 3.3.49.c.i(D)(I) to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b to determine..." instead of "...Condition 4.2.16 to determine...".

EPD Response: The changes has been made as requested.

Comments 47

Page 53: Please fix the typographical error in Condition 3.3.50.a.i to read "paragraph" instead of "pargraph".

EPD Response: The typographical error has been corrected.

Comment 48

Page 53: Please change Condition 3.3.50.b to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b" instead of "...Condition 4.2.16".

EPD Response: The change has been made as requested.

Comment 49

Page 54: Please fix the typographical error in Condition 3.3.50.a.ii to read "Condition" instead of "Condtion".

EPD Response: The typographical error has been corrected.

Comment 50

Page 54: Please change Conditions 3.3.51.a and 3.3.51.a.ii to read "...Condition 4.2.16.a and, as applicable, Condition 4.2.16.b" instead of "...Condition 4.2.16".

EPD Response: The changes has been made as requested.

Comment 51

Page 55: Please change Condition 3.3.52.a to read "...paragraph (c) of..." instead of "...paragraph (d) of...".

EPD Response: The reference has been corrected.

Title V Application Review

Comment 52

Pages 61 and 62: Please remove the following permit Conditions which require the facility to conduct performance testing since the tests have already been performed:

- Condition 4.2.1: The performance test for the Floctyl Acrylates Batch Plant Thermal Oxidizer was performed on July 8 and 10, 2008. A test report dated September 8, 2008 was submitted to Georgia EPD.
- Condition 4.2.2: The performance tests for the Chloromethylation Plant Incinerators and Scrubbers were performed on July 11 through 13, 2008 and September 22 and 23, 2008 (Backup Incinerator/Scrubber retest). Test reports dated August 13, 2008 and November 20, 2008 were submitted to Georgia EPD.
- Condition 4.2.4: The performance test for Powder Plant Line 6 (UF) was performed on December 17 and 18, 2008. A test report dated December 16, 2008 was submitted to Georgia EPD.
- Condition 4.2.6: The performance test for Powder Plant Line 11 (UM) was performed on May 6, 2009. The test report will be submitted by July 5, 2009.
- Condition 4.2.7: The performance tests for Emulsion Plant Phase I Scrubber CE5 were performed on January 26, 2009 and March 5, 2009. A test report dated March 27, 2009 was submitted to Georgia EPD.
- Condition 4.2.8: The performance tests for Emulsion Plant Phase II Scrubber CES2 were performed on January 12 and 13, 2009 and March 3 and 4, 2009. Test reports dated March 16, 2009 and April 17, 2009 were submitted to Georgia EPD.

EPD Response: Due to the complexity of 40 CFR 63 Subpart FFFF, the EPD will leave Conditions 4.2.1 and 4.2.2 in the permit for references purposes in the event that additional performance tests are required. The language for each condition has been modified to remove the initial test language and to indicate that the conditions will apply any time performance tests are conducted.

Condition 4.2.4 has been removed from the permit as the facility has completed and passed the performance testing. Conditions 4.2.6 through 4.2.8 will remain in the permit until the test reports are closed or as direction for additional testing.

Comments 53 and 54

Page 63: Please fix the typographical error in Condition 4.2.11 to read "startup" instead of "startulp".

Page 63: Please delete repeated word "the" in Condition 4.2.11 to read "During the test the Permittee..." instead of "During the test the the Permittee..."

EPD Response: The typographical errors have been corrected.

Comments 55 and 56

Page 72: In Condition 5.2.1, please remove pressure drop from the monitored parameters for the Chloromethylation Plant Scrubbers (CMS1 and CMS2) since this parameter is not required in the MON Rule (40 CFR Part 63 Subpart FFFF). See Comment No. 56 for the proposed re-location of pressure drop monitoring requirements for the CM Plant Scrubbers.

Page 72: Please change Condition 5.2.2.c to read as follows for the addition of the requirement to monitor pressure drop in the Chloromethylation Plant Scrubbers (changes are in **bold**):

Temperature for the venturi/quench and **pressure drop across the packed bed** section for the Chloromethylation Plant Scrubber (Source Code CMS2) at the Chemtall Plant. Data shall be recorded no less than once per every 8 hours of operation of the Chloromethylation Plant Incinerator (Source Code CMI2). The same parameters shall be recorded at the same interval for the backup Chloromethylation Plant Scrubber (Source Code CMS1) during periods that the backup Chloromethylation Plant Incinerator (Source Code CMI1) is in use.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

EPD Response: The Division agrees that pressure drop is not a parameter required to be monitored under 40 CFR 63 Subpart FFFF. The requirement to monitor pressure drop has been moved to Condition 5.2.2.c. The excursion description for pressure drop has also been removed from Condition 6.1.7.c.vii and added to draft Condition 6.1.7.c.viii.

Comments 57 through 59

Page 73: Please change the first sentence of Condition 5.2.4 to read "...emissions from baghouses (including process baghouses) listed in Section 3.1 venting..." instead of "...emissions from all baghouses (including process baghouses) venting..."

Page 74: As discussed in our April 29, 2009 meeting with you, please delete Condition 5.2.4.b. Also, please delete any references to Condition 5.2.4.b and renumber Conditions 5.2.4.c and d (see Conditions 5.2.4 and 5.2.4.c).

Page 74: Please insert the following at the end of Condition 5.2.4.d since the configuration of the stacks and buildings at the site will not allow compliance with the distance and sun positioning requirements:

If due to site constraints (e.g., obstructions from buildings, etc.), the provisions stated in this paragraph cannot be met, then a location with an unobstructed view allowing determination of visible emissions shall be selected instead.

EPD Response: The word "all" has not been removed from the first sentence of draft Condition 5.2.4 as it would not change the requirements of the condition.

The discussion the Permittee refers to involved difficulties with the distance and sun positioning for VE checks for some stacks and if the facility is required to have a certified smoke reader. Draft Condition 5.2.4 allows for two options in the event that visible emissions are detected from a baghouse: 1) a trained observer can determine a numerical opacity value, which would indicate if further action is necessary; or 2) the facility can choose to take action regardless of the numerical opacity value. The facility is requesting to have the first option removed from the permit. This is acceptable to the Division. The facility will have to take action in the event there are visible emissions even if the numerical opacity value does not exceed permit limits. Reference to paragraph b. of the condition has been removed from draft Condition 6.1.7.c.xi.

The language requested by the facility for paragraph d. of the condition has been added to the permit. The following language has also been included: The daily VE log shall indicate checks for which an alternative viewing location is used and shall indicate why the alternative viewing location is required.

Comments 60 through 65

Page 74: Since there are no sources subject to the CAM Rule, please delete Conditions 5.2.6 and 5.2.7.

Page 75: If Condition 5.2.7 cannot be removed as a result of the non-applicability of the CAM Rule, please delete the citation references to the CAM Rule (40 CFR 64) throughout this condition including the associated table.

Page 75: If Condition 5.2.7 is not deleted, please fix the typographical error in Condition 5.2.7.A to read "Condition" instead of "Coniditon".

Page 75: If Condition 5.2.7 is not deleted and since formal Method 9 training is not required for completing the visual emission observations required by Condition 5.2.4, please delete the training requirements for VE checks under Condition 5.2.7.C.

Page 75: If Condition 5.2.7 is not deleted, please fix the typographical error in Condition 5.2.7.D to read "Preventative" instead of "Prevenative".

Page 75: If Condition 5.2.7 is not deleted, please delete the last row (Averaging Period) of the associated table since all entries should be "Not Applicable". Currently, this row indicates "Not Applicable" for pressure drop and the preventative maintenance program. Since a formal Method 9 is not being used, there should be no three minute average required, particularly for observations completed for Condition 5.2.4.a.

EPD Response: The EPD reviewed additional information for the Powder Plants in light of this comment. It has been determined that the Powder Plants are not subject to CAM as the uncontrolled emissions particulate matter emissions from each line do not exceed 100 tpy. It should be noted that this determination does not remove any monitoring requirements for the lines. The facility must continue to monitor pressure drop, conduct preventative maintenance and conduct visible emissions checks for the purposes of demonstrating compliance with Georgia Rules (b) and (e) under the provisions of 40 CFR Part 70. Draft conditions 5.2.6 and 5.2.7 have been removed from the permit.

Comments 66 through 68

Pages 76 and 77: Please fix the typographical errors in Conditions 5.2.10.b and 5.2.10.c to read "...in the following paragraphs..." instead of "...in following paragraphs...".

Page 78: Please fix the typographical error for the Georgia Rule citation in Condition 6.1.3 to read "[391-3-1-.03(10(d)1(i))]" instead of "[391-3-1-.03(10(d)1.(i))]".

Page 81: Please fix the typographical error in Condition 6.1.7.b.xi to read "Any time a fuel..." instead of "Any time fuel a fuel...".

EPD Response: The typographical errors have been corrected.

Comment 69

Page 81: Please revise Condition 6.1.7.c.iv as follows (changes are in **bold**) so that there is not an exceedance for both temperature and the HAP partial pressure limit in Condition 3.3.9:

Any 3-hour average during which the **total HAP partial pressure exceeds 1.0 psia as indicated by a** temperature of the contents of the Methanol Co-Product Tank (Source Code T540) at the Flocryl Acrylates Continuous Plant, measured and recorded in accordance with Condition 5.2.1.c, **exceeding** 48 degrees Fahrenheit.

EPD Response: It is not appropriate to list the partial pressure in the condition because the parameter is not measured directly. Also, the fact that an excursion occurs does not necessarily indicate a violation of the underlying standard. No changes have been made as a result of this condition.

Comments 70 and 71

Page 82: In conjunction with Comment No. 55, please remove the requirement in Condition 6.1.7.c.vii(A) to report daily average pressure drop exceedances in the Chloromethylation Plant Scrubbers (CMS1 and CMS2) since this parameter is not required in the MON Rule (40 CFR Part 63 Subpart FFFF). See Comment No. 71 for the proposed re-location of pressure drop reporting requirements.

Page 82: Please change 6.1.7.c.viii to read as follows for the addition of the requirement to report pressure drop exceedances in the Chloromethylation Plant Scrubbers:

Any three consecutive readings for the Chloromethylation Plant Scrubber (Source Code CMS2) (or for Chloromethylation Plant Scrubber CMS1 when it is used as a backup) at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.c, that is outside of the following limits

- (A) Venturi/quench section maximum temperature: 230 degrees Fahrenheit.
- (B) Pressure drop across the packed bed section: 0.10 to 10.0 inches of water.

EPD Response: Please see the response to Comments 55 and 56.

Comment 72

Page 83: Please fix the typographical error in Condition 6.1.7.c.xi to read "...Condition 5.2.4.a from the same source" instead of "...Condition 5.2.4.a and b. from the same source".

EPD Response: Please see the response to Comment s 58.

Comment 73

Page 83: Please fix the typographical error in Condition 6.1.7.c.xiii(D) to read "Minimum Scrubbant..." instead of "Minimumm Scrubbant...".

EPD Response: The typographical error has been corrected.

Comment 74

Page 83: Please change the pH limits in Condition 6.1.7.c.xiv(A) to a range of "5.0 to 9.0" instead of "2.0 to 9.0" based on pH adjustments made during the March 2009 performance test in order to achieve lower acrylic acid emissions rates on Scrubber CE5.

EPD Response: The change has been made as requested.

Comments 75 through 78

Page 84: Please fix the typographical error in Condition 6.1.7.d.i to read "...Acrylates Continuous Plant" instead of "...Acrylates Continous Plant".

Page 84: Please fix the typographical error in Condition 6.1.7.d.iii to read "...12-month rolling totals for sulfur dioxide..." instead of "...12-month rolling totals sulfur dioxide...".

Page 87: Please fix the typographical error in Condition 6.2.8 to read "...for the recalculation of..." instead of "...for the recalucation of...".

Page 87: Please fix the typographical error in Condition 6.2.10.b to read "...that was performed for Condenser C520..." instead of "...that was preformed for Condenser C520...".

EPD Response: The typographical errors have been corrected.

Comments 75 through 79

Page 89: Please change Condition 6.2.15 to read "...records required by Condition 6.2.14..." instead of "...records required by Condition 6.2.31...".

EPD Response: The reference has been corrected.

Comment 80

Page 89: Please fix the typographical error in Condition 6.2.15 to read "...34 through 39, and 43 through 45..." instead of "...34 through 39, and 43 and 45...".

EPD Response: The typographical errors have been corrected.

Comments 81 and 82

Pages 89 and 90: Please fix the typographical errors in Conditions 6.2.16.c, 6.2.17.c and 6.2.19.c to read "...plans to ensure that the annual..." instead of "...plans to insure that the annual...".

Pages 89 and 90: Please fix the typographical error in Condition 6.2.22 to read "...Batch Plant and..." instead of "...Batch Plant aand...".

EPD Response: The typographical errors have been corrected.

Comments 83 and 84

Pages 89 and 90: Please change the regulatory citation for Condition 6.2.22.a.ii to read "[40 CFR 63.104(f)(1)(iii)]" instead of "[40 CFR 63.104(f)(1)(i)]".

Page 91: Please change the regulatory citation for Condition 6.2.22.a.iii to read "[40 CFR 63.104(f)(1)(iv)]" instead of "[40 CFR 63.104(f)(1)(i)]".

EPD Response: The citations have been corrected.

Comments 85 through 87

Page 97: Please change Condition 6.2.27.b to read "...required by paragraph (a) of this condition..." instead of "...required by paragraph (b) of this condition ...".

Page 97: Please change Condition 6.2.27.c to read "...described in paragraphs (a) and (b) of this condition..." instead of "...described in paragraphs (b) and (c) of this condition ...".

Page 97: Please change Condition 6.2.27.d to read "...required by paragraphs (a) and (b) of this condition ..." instead of "...required by paragraphs (b) and (c) of this condition ...".

EPD Response: The references have been corrected.

Comments 88 and 89

Pages 97 through 99, 101, and 104: Please fix the typographical errors in Conditions 6.2.28 through 6.2.33 to read "Permittee" instead of "Permitee".

Page 100: Please change Condition 6.2.30.b.ii to read "...procedures specified in Condition 6.2.29.c.i." instead of "...procedures specified in Condition 6.2.29.c(i)".

EPD Response: The typographical errors have been corrected.

Comment 90

Page 101: Please change Condition 6.2.31.a.i to read "...required by Condition 3.3.28.b.ii(B)." instead of "...required by Condition 3.3.28.b.ii(A) or (B).".

EPD Response: There appears to have been a typographical error in the regulation. The reference has been shortened to 3.3.28.b.ii.

Comment 91

Page 103: Please delete Condition 6.2.32 since a Notification of Compliance Status report for the Flocryl Acrylates Batch Plant and the Chemtall Plant was submitted in October 2008.

EPD Response: The condition has been deleted and the permit has been renumbered as necessary.

Comments 92 through 96

Page 106: Please change Condition 6.2.35 to read "...Conditions 3.3.31 through 3.3.38..." instead of "...Conditions 3.3.31 through 3.3.34, and 3.3.36 through 3.3.38...".

Page 107: Please change Condition 6.2.35.i to read "...Conditions 3.3.35.n and 3.3.35.o and..." instead of "...Conditions 3.3.35.n and 3.3.35.p and...".

Page 110: Please change Condition 6.2.41.b.x to read "...Condition 3.3.37.c through 3.3.37.e." instead of "...Condition 3.3.37.c through 3.3.37.f".

Page 111: Please change Condition 6.2.44.b.i to read "...Condition 3.3.47.a.iv." instead of "...Condition 3.3.47.d(iii)".

Page 111: Please change Condition 6.2.44.b.iii to read "...Condition 3.3.47.d.i(A)." instead of "...Condition 3.3.46.a(iv)(D).".

EPD Response: The references have been corrected.

Comment 97

Page 112: Please fix the typographical error in Condition 6.2.46.a.i to read "Condition" instead of "Condiitiion".

EPD Response: The typographical error has been corrected.

Comments 98 and 99

Page 112: Please change Condition 6.2.46.a.i to read "...Condition 3.3.46.a and b." instead of "...Condition 3.3.45.".

Page 113: Please change Condition 6.2.46.g to read "...information listed in Condition 6.2.45 for the Initial..." instead of "...information listed in paragraph (a) of this condition for the Initial...".

EPD Response: The references have been corrected.

Comments 100 through 102

Page 113: Please fix the typographical error in Condition 6.2.47.a to read "except as" instead of "exepct as".

Page 113: Please fix the typographical error in Condition 6.2.47.a.ii to read "...40 CFR 60.42c..." instead of "...40 CFR 60.42C ...".

Page 113: Please fix the typographical error in Condition 6.2.48.b to read "initial" instead of "intial".

EPD Response: The typographical errors have been corrected.

Comment 103

Page 118: Please confirm the effective date for Condition 7.12 for 2899-179-0011-V-01-8 for October 29, 2008.

EPD Response: The issuance date for the amendment is correct. The final approval letter following the 45-day EPA review was issued on October 29, 2008.

Comment 104

Page 128: Please delete, or indicate as not applicable, Condition 8.24 for Incinerators since Georgia Air Rule 391-3-1-.02(2)(c)(viii) indicates that "The provisions of this subsection (c) shall not apply to ...(viii) any vent gas incineration devices that are used as air pollution control equipment...". The facility does not operate any incinerators other than the air pollution control equipment (CMI1, CMI2, TO01). As a result, this Condition is not applicable.

EPD Response: The provisions in Section 8.0 are general provisions that are included in all Title V permits. No changes have been made to the permit as a result of this comment.

Comment 105

Attachment B, Page 4: Please delete the following tanks since they are included as Emission Units in Condition 3.1 due to their status as Group 2 storage tanks under the MON Rule:

- Chemtall Plant – Formaldehyde Tank, 10,000 gallons (FOR)
- Chemtall Plant – Hydrochloric Acid Tank (HC02); See Comment No. 18, which requests that the Hydrochloric Acid Tanks are added to Condition 3.1.
- Flocryl Plant – Residue Tank (T099); This tank is also referred to as the Catalyst Residue Tank (V550).

EPD Response: The changes have been made as requested.

Public Comments**Comment 1**

SNF Riceboro has Substantially Increased Production and Emissions in a Piece-meal Fashion, Circumventing PSD Review.

In March of 2008 and again in March of 2009, GreenLaw submitted comments on behalf of OCRK, which addressed the fact that EPD has allowed SNF many minor permit and off-permit increases in production and modifications to processes and methods of operation. This practice has resulted in various permit amendments and modifications, without an overview of the relationship of the requested modifications to the overall production capacity of the plant. When SNF's modifications are viewed cumulatively, it becomes clear that piece-meal permitting has resulted in the circumvention of controlling PSD regulations.

Cumulative constructions and/or modifications at SNF-Riceboro since 2003 are associated with potential emissions of volatile organic compounds (VOCs) and nitrogen oxides (NO_x) equaling or exceeding 40 tons per year. These constructions/modifications were planned by SNF in 2003 and seem to have been intentionally split to circumvent the PSD requirements of 40 CFR § 52.21 and Ga. Comp. R. & Regs. r. 391-3-1-.02(2)7. As such, SNF-Riceboro is not in compliance with 40 CFR §52.21 and Ga. Comp. R. & Regs. r. 391-3-1-.02(2)7, "Prevention of Significant Deterioration (PSD)" and Ga. Comp. R. & Regs. r. 391-3-1-.03(1), "Construction (SIP) Permit" for both ozone (which includes VOCs) and nitrogen oxides. Accordingly, EPD cannot approve the issuance of this Title V operating permit.

The requirements of 40 CFR § 52.21 and Ga. Comp. R. & Regs. r. 391-3-1-.02(2)7 are triggered when a construction or modification results in a "significant emission increase" at a "major source." A "significant emission increase" for ozone (including volatile organic compounds) and nitrogen oxides is defined under 40 CFR § 52.21(b)(23)(i) as 40 TPY, each.

Title V Application Review

a. Volatile Organic Compounds (VOCs) Emissions Increase

From 2003 to 2007, SNF applied for nine (9) projects which resulted in a cumulative increase in VOCs in the amount of 40 TPY. See Table 1. The time elapsed between each application averages only three and a half months. Viewed cumulatively, these changes qualify as a major modification as defined by 40 C.F.R. § 52.21(a)(2)(iv)(a) because a 40 TPY increase of VOC emissions qualifies as a "significant" emissions increase, triggering formal PSD review. 40 C.F.R. § 52.21(b)(23)(i).

The modifications that resulted in VOC emissions increases spanned all three plants – Chemtall, Flocryl (Flocryl Acrylamide or Bio-Flocryl), and NCF Manufacturing (Flocryl Acrylate). Each of these modifications involved the construction of new units and baseline emissions for these new units were zero. Therefore, the emission increase associated with these modifications could not be discounted by past actual emissions.

Table 1. Cumulative Increases in VOC Emissions at SNF-Riceboro.

Application No.	Modification Type	Date of Application	Time Between Applications (months)	VOC Emission Increase (TPY)	Affected Facility
14742	Off-Permit	15-Aug-03	N/A	0.944	Chemtall
14721	0011-V-01-2	September 07, 2003	0.733333	0	Chemtall
14743	0011-V-01-1	September 11, 2003	0.133333	0	Chemtall
15221	Off Permit	29-Dec-03	3.6	1.46	Bio-Flocryl
Addendum to 14721	0011-V-01-2	January 15, 2004	0.533333		Chemtall
Addendum to 14743	0011-V-01-1	January 26, 2004	0.366667	0	Chemtall
15060	0011-V-01-3	February 13, 2004	0.566667	8.87	Chemtall
15132		March 18, 2004	1.166667		Chemtall
15620	Off Permit	8-Sep-04	5.666667	1.86	Flocryl Acrylates (NCF Manufacturing)
15656	Off Permit	27-Sep-04	0.633333	0.02	Chemtall
15963	0011-V-01-7	January 18, 2005	3.7	15.776	Chemtall
Addendum to 15963		October 17, 2005	8.966667		Chemtall
None	Off Permit	November 13, 2006	12.86667	0.29	Chemtall (and Bio-Flocryl)
17096	0011-V-01-7	November 20, 2006	0.233333	8.94	Chemtall
17698	0011-V-01-8	September 27, 2007	10.23333	1.47	Chemtall and Flocryl Acrylates
Cumulative Total				40.02	

On May 12, 2008, the facility installed a thermal oxidizer which decreased emissions of VOC by 138.6 TPY. Even though some of the modifications were permitted after the installation of the oxidizer, they were applied for and proposed by company officials well before 2008. For instance, modifications resulting in 1.47 and 8.94 TPY of VOCs were applied for in applications (letters) dated September 27, 2007 and dated January 18, 2005, October 17, 2005, and November 20, 2006, respectively. However, without any record or explanation, approval of these applications was delayed until October 29, 2008 and July 23, 2008, respectively. Nonetheless, cumulative VOC emissions applied for prior to the permitting of the thermal oxidizer totaled 40 TPY, equaling the significant emissions threshold for VOC. 40 C.F.R. § 52.21(b)(23)(i).

Moreover, the decrease in VOC emissions associated with the thermal oxidizer is not creditable toward netting out of PSD for the 2003-to-2007 modifications because the thermal oxidizer did not operate during the contemporaneous period preceding the application dates for these modifications.

b. Current VOC Controls are not BACT.

Because the cumulative VOC emissions increase qualifies as a major modification under the PSD permitting program, the facility is prohibited from commencing construction without a permit that contains emissions limits that represent the capabilities of the best available control technology ("BACT") for each regulated pollutant for which there will be a significant net emissions increase at the source. 40 C.F.R. § 52.21(j)(3), Ga. Comp. R. & Regs. r. 391-3-1-.02(7)(b)(7). Georgia incorporates by reference the federal definition of Best Available Control Technology, found at 40 C.F.R. § 52.21 (b)(12).

The following VOC controls are currently in place at the Title I (PSD) site:

- The venting of Flocryl Acrylate (NCF Manufacturing) process vents to condensers, scrubbers, and the thermal oxidizer (installed on or after May 12, 2008);
- The compliance of the Flocryl Acrylates Plant (NCF Manufacturing) with 40 CFR Part 63 Subpart B and FFFF;
- The compliance with 40 CFR Part 63 Subpart B, F, G, and H for the acrylamide plant (Flocryl Acrylamid or Bio-Flocryl);
- The compliance of the Flocryl Acrylates Plant (NCF Manufacturing) with 40 CFR Part 60, Subpart NNN and RRR;
- The Leak Detection and Repair Program required by 40 CFR Part 60 Subpart VV for Flocryl Acrylate (NCF Manufacturing) and Part 63 Subpart B, F, H, UU, and FFFF for Bio-Flocryl (Acrylamide), Flocryl Acrylates (NCF), and Chemtall plants; and
- Several process tanks, storage tanks, and ancillary operations are subject to 40 CFR Part 63 Subparts B, F, G, and FFFF.

However, these current VOC controls do not necessarily constitute VOC BACT for the following reasons:

- There are organic chemical manufacturers that vent all process vents, not just those of one process, to a thermal oxidizer having a control efficiency of 98+% for VOC.
- Although SNF may have begun compliance earlier than required, the compliance deadline for the later MACT standards and Case-by-Case MACT did not begin until after modifications were applied for from 2003 to 2007.
- Several tanks have no add-on control and are not subject to NSPS or MACT. It is unclear whether these tanks are designed or retro-fitted to minimize evaporative VOC losses.

c. Nitrogen Oxides (NO_x) Emissions Increase

Since 2006, SNF applied for three (3) projects which resulted in a cumulative increase in nitrogen oxides equaling or exceeding 40 TPY. No more than three months elapsed between each permit issuance. Moreover, the time elapsed between two of the applications was less than four months.

Table 2. Cumulative Increases in NO_x Emissions since 2007 at SNF-Riceboro

Application No.	Amendment No.	Date of Permit Issuance	Date of Permit Application	Time Elapsed Between Permits	NO _x Emission Increase (TPY)
17920	0011-V-01-6	12-May-08	11-Jan-08	N/A	1.89
17096	0011-V-01-7	23-Jul-08	November 20, 2006	2.37	10.6
17698	0011-V-01-8	29-Oct-08	27-Sep-07	3.20	39.9
Cumulative Total					52.39

d. Piece-meal Permitting is PSD Circumvention.

Major source New Source Review programs such as Prevention of Significant Deterioration ("PSD") require a comprehensive review. A piece-meal approach can result in circumvention of PSD and failure to adequately control emissions and adequately protect human health and the environment.

Indeed, the New Source Review Manual ("NSR Manual") states, "[a] deliberate decision to split an otherwise 'significant' project into two or more smaller projects to avoid PSD Review would be viewed as circumvention and would subject the entire project to enforcement action if construction on any of the small projects commences without a valid PSD Permit." NSR Manual at A. 36.

Review of the SNF file maintained by EPD reveals several requested permit modifications that all seem to correspond to a multiphase facility-wide expansion. EPD's failure to address the requested permit modifications in a cumulative way is problematic and contrary to law, especially considering that SNF has informed EPD of a clear intention to expand.

Just three months after approval to conduct business in Georgia, in November 2003, SNF prepared an argument entitled "Development of Acrylamide Ambient Acceptable Concentration for SNF Holding Company" in which it petitioned the GA EPD to raise the annual ambient acceptable concentration of acrylamide in keeping with a superseded 1998 GA EPD policy and plans by CalEPA to revise the acrylamide IRIS standard. In this same report, SNF already projected powdered polyacrylamide flocculent sales in its "Long Term Expansion Plans" and indicated that "SNF needs to plan now (2003) how to meet these sales demands" because the "Riceboro site is currently a key global manufacturing site for SNF."

Further, in a power point presentation dated 2005, on a slide titled "Long-Term Expansion Plans," SNF notes "Currently 9 powder plants at Riceboro facility - One new powder plant anticipated per year for the next 8 to 10 years." Later slides within the same presentation state "Doubling of production should result in less than doubling of emissions." These statements make clear SNF's intentions for expansion.

And lastly, in an article dated 2002, the president of SNF Holding Co. and CEO of SNF Inc. in Riceboro, Georgia, Peter W. Nichols, declared that SNF was expanding two of its US plants, the California and Washington facilities, to support growth (demand) in Asia for wastewater treatment chemicals (polyacrylamide), which was reported as early as 2001. The increased demand for polyacrylamide was forecasted out to 2005 at a total of 142,000 tons.

In addressing a facility's request for multiple minor modifications, the NSR Manual states, "two basic questions should be asked First, were the projects proposed over a relatively short period of time? Second, could the changes be considered as part of a single project?" NSR Manual at A.37. A comprehensive review of the modifications to the SNF facility and the contents of the SNF file maintained by EPD indicate that the answer to these questions is a resounding "yes." However, there is no indication in the file that EPD has researched capital expenditure requests and other agency filings to determine whether the projects that have been permitted separately should be aggregated as one modification.

In light of the significant emissions increases at the facility, and the triggering of PSD, EPD should exercise its right to issue a retroactive PSD permit and a Title V Operating Permit for a contemporaneous period of 10 years consistent with NSR reform for non-utilities. Moreover, because PSD has been triggered, SNF-Riceboro is operating without having obtained an operating permit with PSD provisions. This is in direct contravention of controlling law.

EPD Response: The EPD has reviewed the files in response to this comment. It should be noted that the SNF site is a combination of three major manufacturing sections. These are the Chemtall section, the Floccryl Acrylates section, and the Floccryl Acrylamide section. It is not unusual for such a site to have multiple, unrelated projects over a period of time due to the size of the operations and the numerous products that can be manufactured. In general, SNF's business decisions are based on which products are most in demand at any given time.

The Division noted that the individual project VOC emissions in Table 1 result in a total of 39.63 tons of VOC rather than 40.02 tons. This is less than the PSD threshold. Nonetheless, there does not appear to be a case for circumvention. For example, the addition of two boilers (TV-17698) was an effort to place steam production capabilities closer to the processes that are using the steam. It was not due to a lack of overall steam production capabilities. In another case, the facility submitted an off-permit change (TV-15620) in response to a possible shortage of a key raw material.

Activity at the powder plants (TV-15060 and TV-17906) has been driven by delays in development at plant sites outside of Georgia and increased demand in the enhanced oil recovery market (some powder plant produce material for the wastewater treatment market). Some of the powder plant activities also involved modifications aimed at reducing waste and particulate matter emissions. The Division notes that particulate matter emissions were a source of community complaints in the past. It should be also noted that the powder plants are separate operations from the liquid product operations. The facility has stated the dispersant/liquid operations (TV-14721 and TV-15963) projects occurred in response to a potential acquisition. The bulk of the permitted emissions never occurred because the facility ultimately did not manufacture the highest emitting products at the Riceboro facility. Based on the emissions total and the above information, the Division does not consider the past modifications applied for by SNF to be one project. The Division will continue to review each application for NSR/PSD applicability and will address separate modifications as one project if it is determined that a series of changes are indeed one project.

The Division reviewed the same information with respect to NO_x emissions. Application TV-17920 was for the installation and operation of a Thermal Oxidizer for the Flocryl Acrylates Batch Plant. The control of emissions from this plant is required by 40 CFR 63 Subpart FFFF, which had a compliance date of May 10, 2008. The purpose of the project was to comply with federal regulation and is not related to either of the projects listed in Table 2. As discussed above, Application TV-17906 was related to the delays at plant sites outside of Georgia and Application TV-17698 allowed the facility to move steam production capabilities closer to existing equipment. The operation of the boilers is not related to the operation of the powder plants. Again, the Division does not believe the circumvention has occurred in this case. The Division will continue to review each application for NSR/PSD applicability and will address separate modifications as one project if it is determined that a series of changes are indeed one project.

The commenter discussed a delay that occurred for Application TV-17698 and TV-15963/17096. Permit process time is affected by factors such as the complexity of the action and the workload of the permitting staff. Also, the Division may request additional information during the review process. Specifically for Air Quality Permit No. 2899-179-0011-V-01-7, the additional processing time was related to accommodating requests for a public hearing for Application TV-15963. The Division also combined Application TV-17096 with Application TV-15963 to provide the public the opportunity to have a hearing on those modifications as well.

No changes have been made to the permit as a result of these comments.

Comment 2

The Statement of Basis and the Title V Renewal for SNF Riceboro are Flawed Because the Narrative Omits Required Information.

In the statement of basis for the draft Title V operating permit for SNF-Riceboro, the Georgia Air Protection Branch omitted information regarding Facility-Wide Permit Conditions, Facility-Wide Rule Applicability, Equipment-Specific Rule Applicability, Equipment-Specific Permit Conditions, Specific Testing Requirements, Specific Monitoring Requirements, and Specific Recordkeeping And Reporting Requirements.

Instead, EPD provides references to the statement of basis for the initial Title V operating permit for the same facility. However, there is no hyperlink to the initial narrative on the Georgia Air Protection Branch's website or the Liberty County Courthouse website. Further, the hyperlink to the initial application under "Archived Title V Applications [S]" of the Georgia Air Protection Branch website, where some of this information may be found, shows an application for a different facility, "Southern Natural Gas Company – Hall Gate Compressor Station – March 2003." As such, no copy of the initial statement of basis has been made publicly available on the Georgia Air Protection Branch's website.

EPD should revise the draft statement of basis to include the sections mentioned above and should make this document accessible to the public via their website.

EPD Response: The EPD has corrected the link error noted by the commenter. Despite the error, the document is and continues to be available for public review through the Air Branch permitting file room and has been made available to the commenter on multiple occasions. The public notice and the website also list contact information in the event that a citizen has additional questions or needs assistance accessing documents. No changes have been made to the permit as a result of these comments.

EPD Changes

The permit has been renumbered where necessary.

The format of condition reference numbers has been updated. For example, a reference to 6.1.7.a(i) now reads 6.1.7.a.i. The change provides consistency with the format used in the Georgia air quality rules.

The EPD has included the final excursion parameters for Conditions 6.1.7.c.v through 6.1.7.c.vii.